



MARINE DOCK

SOUTH TANK FARM

NORTH TANK FARM

FILL MANAGEMENT PLAN

FORMER BULK OIL STORAGE FACILITY SITE

BEACHAM STRET, EVERETT, MA

SEPTEMBER, 2024

PREPARED FOR: EVERETT LANDCO

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1.1 Introduction

This Fill Management Plan (FMP) provides an overview of the procedures to be implemented to manage the acceptance and placement of soils and uncoated asphalt, brick, and concrete (ABC) rubble at the former ExxonMobil Terminal Site located off Beacham Street in Everett, Massachusetts (Site). The FMP outlines the procedures to be implemented for the import of soils and uncoated ABC rubble needed to (1) raise the elevation of the Site for resiliency; (2) implement the remedy under the Massachusetts Contingency Plan (MCP, 310 CMR 40.0000) Regulations; and (3) facilitate the Site's redevelopment including buildings, greenspaces, utilities and roadways. Implementation of the FMP will be performed by Charter Contracting Company, LLC (Charter) on behalf of the Site Owner and Developer, Everett Landco, LLC (ELC).

The acceptance of soils in accordance with this FMP is part of the MCP remedy for the Site. The following also provides an overview of the general requirements for processing of incoming soils so that they meet the geotechnical requirements needed for redevelopment of the Site.

The final design plans for redevelopment of the Site are being prepared. The current MCP remedy will require the placement of up to approximately 500,000 to 700,000 cubic yards (cy) of imported soil to the Site. Site plans prepared by VHB for ELC for the remediation work including the current grading and stormwater controls are provided in Attachment A. A property survey of the Site is included in Attachment C to this FMP.

All of the soils proposed for use at the Site generated at off-site Generator Sites will be properly characterized and documented. The soils will be received at the Site may be temporarily stockpiled to be processed to meet the geotechnical requirements for the proposed redevelopment.

1.1.1 Administrative Consent Order

An Administrative Consent Order (ACO) is between ELC and the Massachusetts Department of Environmental Protection (MassDEP) references this FMP and confirms the management protocols that will ensure activities are conducted in a manner that is protective of human health and the environment.

The FMP may be modified to revise operational procedures or Acceptance Criteria for imported soils. The process for MassDEP approving modifications to the FMP is outlined in the ACO.

As the FMP is implemented, ongoing community engagement and Environmental Justice Community outreach will continue through meetings and publicly available updates.

1.2 Site Description and Background

The Site consists of an approximately 85-acre parcel located in Everett, Massachusetts. The property is City of Everett Assessor's Parcel H0-01-000130. See Site locus on Figure 1.



Figure 1
Project Site Locus

Former XOM Terminal
42-148 Beacham Street
Everett, Massachusetts

April
2024

0 500 1000 feet

AERIAL SOURCE: MassGIS 2019

Beacham Street divides the Site into two areas: a northern area known as the North Tank Farm, and a southern area, known as the South Tank Farm(STF). The NTF includes 52 Beacham Street, while the STF includes 51 Robin Street and 0 South Farm Road, which are connected via a small access road. Existing site grades range from approximately elevation 4 to 30-feet (North American Vertical Datum of 1988, NAVD88). Approximate existing grades of designated areas of the Site are shown on the plans provided in Attachment A.

The Site was operated as an oil refinery and/or a petroleum bulk product storage facility since approximately 1920. The oil refinery was constructed circa 1920 by Eastern Gas & Oil, and through subsequent acquisitions, mergers, and rebranding, became ExxonMobil by 1999. During full-scale operation, refinery operations were located in the NTF. After refinery operations ceased in 1965, Site operations were limited to bulk storage of refined petroleum products in the NTF and asphalt production and distribution in the STF until operations ceased in 2021 in anticipation of the property transaction that eventually transferred the Site property to Everett LandCo, LLC.

The Site is listed by MassDEP as Release Tracking Number (RTN) 3-0000310 in accordance with the MCP Regulations. The listing was officially noticed to MassDEP on August 21, 1986. The remediation requiring the importing of soils, will be conducted under this RTN. At the completion of the soil import and construction, an Activity and Use Limitation (AUL) will be placed on the property in accordance with the MCP. The AUL will outline the requirements for the management of existing and imported soils during construction of the redevelopment and for future improvements. Additional information on the filings made under the MCP for the Site can be found at the following link:

<https://eeaonline.eea.state.ma.us/portal/dep/wastesite/viewer/3-0000310>

1.2.1 Project Parties

The following are the parties who will be overseeing and performing the work as described in this FMP:

Site Owner and Developer

Everett Landco, LLC
125 High Street, Suite 2111
Boston, MA 02110
Site Contact: TBD

Site Remediation Contractor

Charter Contracting Company, LLC
500 Harrison Avenue, Suite 4R
Boston, MA 02118
Site Contact: Shane Gray
Cell Phone: (857-337-0494)
Email: SGray@charter.us

Site LSP and Geotechnical Engineer

Haley & Aldrich, Inc.

465 Medford Street #2200

Charlestown, MA 02129

Contact: Ian M. Phillips, LSP

Telephone: 617-886-7483

iphillips@haleyaldrich.com

1.2.2 Adjacent Land Uses

The Site is bounded by commercial/industrial properties to the south and east, residential properties to the west, and the Newburyport/Rockport MBTA Commuter rail line to the north. See Figure 1 for a locus plan and aerial map of the Site and surrounding areas.

1.2.3 Sensitive Receptors and Resource Areas

A figure downloaded from MassDEP information showing potential sensitive receptors and resource areas in the vicinity of the Site is provided as Figure 2. There are residential areas located to the west of the Site. There are no known public or private water supplies in the vicinity of the Site. The Site is located within the Mystic River watershed and the River is located approximately 1,200-feet south of the Site.

As described in the Notice of Intent (NOI) prepared by VHB for the remediation activities, there are no wetland resource areas at the Site except for Land Subject to Coastal Storm Flowage (LSCSF). LSCSF is defined under MassDEP's Wetlands Protection Regulations (310 CMR 10.04) as "Land subject to any inundation caused by coastal storms up to and including that caused by the 100-year storm, surge of record or storm of record, whichever is greater." As discussed in the NOI submitted to the Everett Conservation Commission, within the limits of the Site, jurisdictional areas of LSCSF are generally characterized by areas of existing impervious pavement and the presence of above-ground fuel storage tanks and associated infrastructure. The extent of the LSCSF is shown on the plans included in Attachment A. An Order of Conditions (OOC) was issued by the Everett Conservation Commission on June 20, 2024. A copy of the OOC is also provided in Attachment A.

MassDEP - Bureau of Waste Site Cleanup

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

Site Information:

FORMER XOM TERMINAL
42-148 BEACHAM STREET EVERETT, MA
3-000000310

NAD83 UTM Meters:

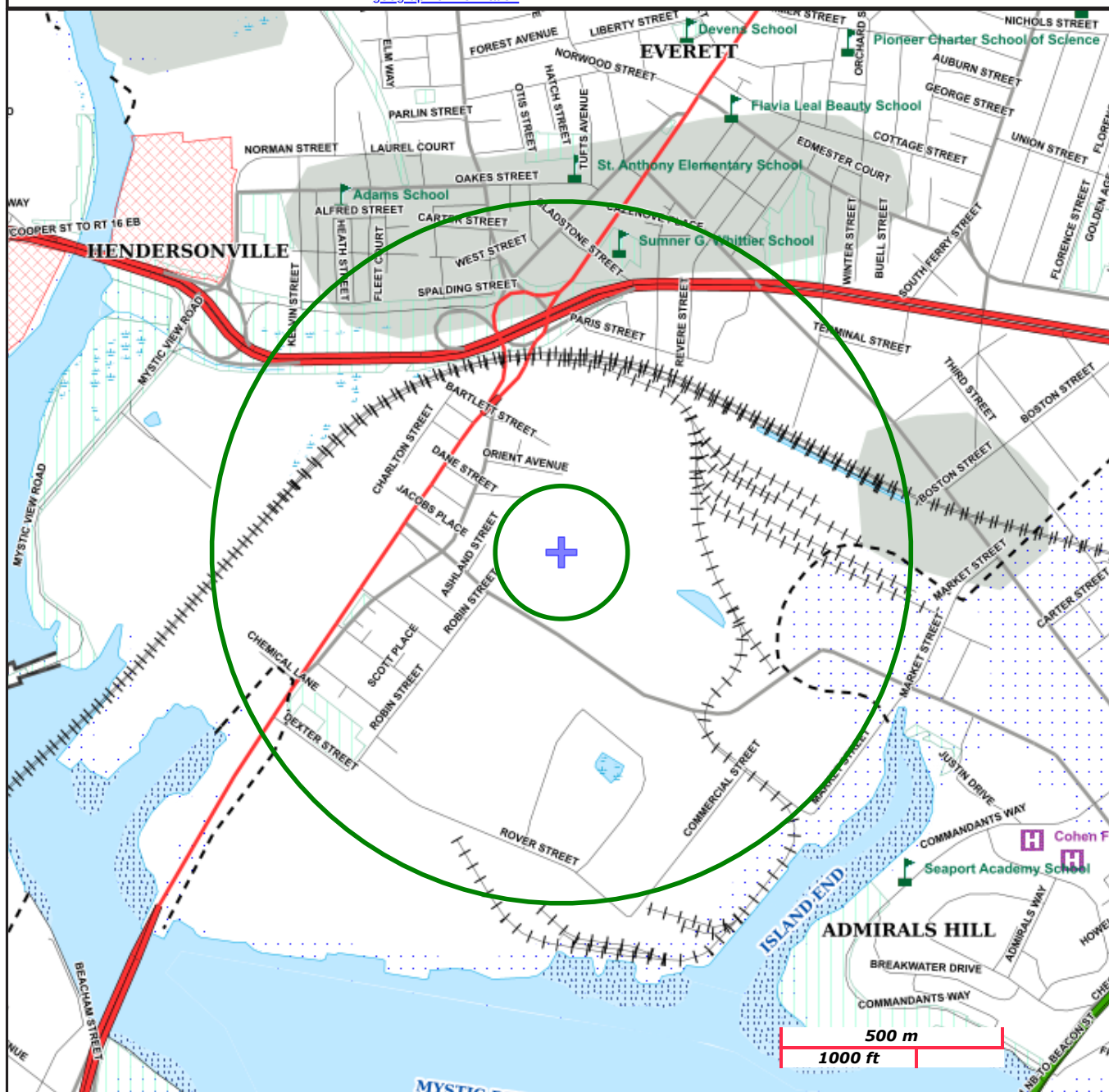
4695980mN , 330511mE (Zone: 19)
April 17, 2024

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



MassDEP

Commonwealth of Massachusetts
Department of Environmental Protection



Roads: Limited Access, Divided, Other Hwy, Major Road, Minor Road, Track, Trail
Boundaries: Town, County, DEP Region; Train; Powerline; Pipeline; Aqueduct
Basins: Major, PWS; Streams: Perennial, Intermittent, Man Made Shore, Dam
Aquifers: Medium Yield, High Yield, EPA Sole Source
Non Potential Drinking Water Source Area: Medium, High (Yield)

PWS Protection Areas: Zone II, IWPA, Zone A
Hydrography: Open Water, PWS Reservoir, Tidal Flat
Wetlands: Freshwater, Saltwater, Cranberry Bog
FEMA 100yr Floodplain; Protected Open Space; ACEC
NHESP Pri-Hab of Rare Species; Vernal Pool: Cert, Potential
Solid Waste Landfill; PWS: Com.GW,SW, Emerg., Non-Com.

Figure 2
Site Assessment Map

Former XOM Terminal
42-148 Beacham Street
Everett, Massachusetts

April
2024

2.1. Introduction

The operational procedures described in this FMP have proven effective in mitigating potential impacts from activities involving the receipt and placement of soils in Massachusetts at large construction projects including inactive sand pits and quarries. The requirements will be implemented so that operations can proceed in an appropriate manner and allow the Site to be remediated and graded to an elevation that will protect the implemented remediation, increase the overall resiliency of the Site and facilitate redevelopment.

This FMP also includes the demolition of portions of concrete bunkers that historically held petroleum. It is anticipated as matter of safety that portions of these bunkers may be left in place to prevent the failure of adjacent roadways, structures, and utilities. The concrete from the demolition will be assessed, crushed, and reused at the Site and a Condition of No Significant Risk to human health, safety, welfare, and the environment that supports a Permanent Solution in accordance with the MCP will be achieved. These activities are described in Section 3.4.

The imported soils that are the subject of this FMP will be from off-site construction and remediation projects where the soils have previously been characterized by the Generator Site LSP. Prior to acceptance of soils at the Site, the Site LSP will review the information of the soils from each Generator Site proposed to be delivered to the Site. The review will be for compliance with the requirements of this FMP and any other permits and approvals.

2.2 Establishment of Acceptance Criteria for Imported Soil

All imported soils to be accepted at the Site will be sampled and analyzed for the parameters as outlined on Table 1. The Site LSP may require other parameters to be analyzed based on a review of the Generator Site history.

The Acceptance Criteria for imported soils subject to this FMP will be consistent with 310 CMR 40.0032 (3) of the MCP and the MassDEP's Similar Soils Provision Guidance. For completeness, the Acceptance Criteria for imported soils are presented in Table 2.

The Site will not accept Characteristic or Listed Hazardous Waste unless a Contained-in-Determination (CID) has been provided by the Site LSP and approved by MassDEP.

The Site-specific Acceptance Criteria shown on Table 2 have been developed in accordance with the MCP, MassDEP policies and guidance documents, and a Site-specific analysis completed by the Site LSP that incorporates the proposed mixed-use redevelopment of the Site. The Acceptance Criteria for imported soil accomplishes the following:

- Protect the background levels of underlying groundwater to prevent unacceptable levels through leaching from the imported soils into Site groundwater;
- Minimize human exposure at the Site and abutting properties from direct contact with the soils or inhalation of vapors or particulates;

Table 1
Minimum Required Testing Parameters for Imported Soils

Constituent and Analytical Methods
Required Constituents
Semi-Volatile Organic Compounds (SVOCs) – EPA Method 8270
Volatile Organic Compounds (VOCs) – EPA Method 8260
Polychlorinated Biphenyls (PCBs) – EPA Method 8082
MCP-14 Metals – EPA Method 8080/6010
Hexavalent Chromium if concentration of Total Chromium is greater than 100 mg/kg – EPA Method 7196A
Total Petroleum Hydrocarbons (TPH) and/or Extractable Petroleum Hydrocarbons (EPH)/Volatile Petroleum Hydrocarbons (VPH) Fractions – MassDEP Methods
Toxicity Characteristic Leaching Protocol (TCLP) for metals and organic compounds when the total concentrations in the sample are above the theoretical levels at which the corresponding TCLP Criteria may be exceeded – EPA Method 1312
pH/Corrosivity
Net Acid Generation (Blasted Rock Only)
Other Constituents – See Note 3
Ignitability/Flashpoint, Reactive Sulfide, Reactive Cyanide
Pesticides – EPA Method 8081
Herbicides – EPA Method 8151
Other laboratory analysis as deemed prudent by the Generator Site LSP based on Generator Site history and review of existing data. See Note 3 below.

Notes:

1. Current EPA/MassDEP or other approved methods for laboratory testing. MassDEP Compendium of Analytical Methods (CAM) methods and reporting limits must be utilized where available.
2. Reporting limits for laboratory tests must be appropriate and adequate for comparison to Acceptance Criteria. Site LSP may accept soils with detection limits that are higher than the corresponding Acceptance Criteria based on review of Generator Site History and other information.
3. Other Constituents are required to be analyzed unless it is demonstrated that, based on review of Generator Site history including background information on abutting properties and historic releases, the specific constituent is not associated with historic activities on the Generator Site.
4. Grain Size Sieve Analysis and Total Organic Carbon must be tested by ASTM D422 and ASTM D2974, respectively, for each soil type proposed from the Generator Site. Testing performed shall be adequate to meet Site geotechnical requirements as determined by the Site Geotechnical Engineer.

Table 2
Summary of Acceptance Criteria for Imported Soils
Former XOM Terminal Site, Everett, Massachusetts

Constituent	Acceptance Standard (mg/kg dry weight)
Semi-Volatile Organic Compounds (SVOCs)	
Acenaphthene	<4
Acenaphthylene	<2
Anthracene	<1,000
Benzo (a) anthracene	<20
Benzo (a) pyrene	<2
Benzo (b) fluoranthene	<20
Benzo (g,h,i) perylene	<1,000
Benzo (k) fluoranthene	<200
Bis(2-Ethylhexyl)phthalate	<100
Chrysene	<200
Dibenzo (a,h) anthracene	<2
Dibenzofuran	<100
Fluoranthene	<1,000
Fluorene	<1,000
2-Methylnaphthalene	<0.7
Indeno (1,2,3-cd) pyrene	<20
Naphthalene	<4
Phenanthrene	<10
Pyrene	<1,000
Other SVOCs	To be considered on a case-by-case basis. For compounds with no RCS-1 values listed in the MCP, provided there is no reason to believe such compounds would be present in the soil, the Acceptance Standard is less than the Reporting Limits for those analytes established in the CAM methods.
Petroleum Hydrocarbons	
Total Petroleum Hydrocarbons (TPH)	1,000
AND/OR	
C9-C18 ALIPHATIC FRACTION – EPH	<1,000
C19-C36 ALIPHATIC FRACTION – EPH	<3,000
C11-C22 AROMATIC FRACTION – EPH	<1,000
C5-C8 ALIPHATIC – VPH	<100
C9-C12 ALIPHATIC – VPH	<1,000
C9-C10 AROMATIC - VPH	<100
Pesticides/Herbicides and Other Specific Analytes	
Pesticides and Herbicides	<10% of RCS-1 or 0.05 mg/kg, whichever is greater, provided that both the Reporting Limits and results are less than RCS-1 concentrations. To be considered on a case-by-case basis
Other Analytes with No Specific RCS-1 Values	Evaluated for acceptance on a case-by-case basis

Table 2, continued
Summary of Acceptance Criteria for Imported Soils
Former XOM Terminal Site, Everett, Massachusetts

Constituent	Acceptance Standard (mg/kg dry weight)
Volatile Organic Compounds (VOCs)	
Acetone	<6
Benzene	<2
Ethylbenzene	<40
Methyl tert-butyl ether	<0.1
Toluene	<30
Xylenes (total)	<100
Other VOCs	To be considered on a case-by-case basis. <10% of RCS-1 or 0.1 mg/kg, whichever is greater, provided that both the Reporting Limits and results are less than RCS-1 concentrations.
Toxicity Characteristic Leaching Procedure (TCLP) Testing	Analyzed if Detected Concentrations Exceed "20-times rule." Results must be below established TCLP standard.
Polychlorinated Biphenyls (PCBs)	
Total PCBs	<0.1
Metals	
ANTIMONY	<20
ARSENIC	<20
BARIUM	<1,000
BERYLLIUM	<100
CADMIUM	<80
CHROMIUM (TOTAL)	<100
CHROMIUM (III)	<1,000
CHROMIUM (VI)	<100
LEAD	<200
MERCURY	<20
NICKEL	<700
SELENIUM	<400
SILVER	<100
THALLIUM	<8
VANADIUM	<500
ZINC	<1,000
Toxicity Characteristic Leaching Procedure (TCLP) Testing	Analyzed if Detected Concentrations of Metals Exceed "20-times rule." Results must be below established TCLP standard.
Other Metals	To be considered on a case-by-case basis. Not to Exceed RCS-1

Table 2, continued
Summary of Acceptance Criteria for Imported Soils
Former XOM Terminal Site, Everett, Massachusetts

Constituent	Acceptance Standard (units)
Soil Characteristics	
pH	5 to 9 standard units (>4 and <11 accepted on case-by-case basis)
Soils mixed with slurry or bentonite	<1% by volume
Soils mixed with asphalt, brick and concrete (ABC) materials	<5% by volume
Solid Waste	Less than 1% by visual inspection
Ignitability	Not capable under standard temperature and pressure of catching fire through friction, absorption of moisture or spontaneous chemical changes and, when ignited, burns so vigorously and persistently that it creates a hazard.
Reactive Sulfide	<500 mg/kg
Reactive Cyanide	<250 mg/kg
Physical Testing	
Grain Size (ASTM D422)	Assessed by Site Geotechnical Engineer and Charter for each soil type from the Generator Site
Organic Content (ASTM D2974)	
Other Physical and Geotechnical Testing	

Notes

1. Current EPA/MassDEP or other approved methods for laboratory testing. MassDEP CAM utilized where available.
2. Reporting limits for laboratory tests must be appropriate and adequate for comparison to acceptance criteria. Site LSP may approve soils with detection limits that are higher than the corresponding Acceptance Criteria based on review of Generator Site History and other information.
3. Averaging of concentrations is not allowed. All constituents must be below their corresponding Acceptance Criteria.
4. Soils mixed with *de minimis* amounts of bentonite or other slurry materials (<1% by volume) may be accepted on a case-by-case basis.
5. Materials that are unacceptable include:
 - a. Soil originating from a Manufactured Gas Plant sites regardless of concentrations.
 - b. Coated/painted ABC unless specifically approved by MassDEP
 - c. By-products of manufacturing facilities such as a lead smelter.
 - d. Street sweepings
 - e. Catch basin cleanings
 - f. Industrial wastes

- Minimize the degradation of wildlife habitats; and
- Minimize the degradation of adjacent properties, wetlands, and waterways through stormwater runoff.

Table 3 provides a summary of the minimum, maximum and average VOC and petroleum hydrocarbon concentrations historically detected at the Site.

Table 3
Summary of Existing Site Data
Former XOM Terminal Site, Everett, Massachusetts

Oil or Hazardous Material	Site Concentration Range (mg/kg)			Arithmetic Average
	min		max	
VOCs				
Acetone	0.5	-	0.5	3.90
Benzene	ND	-	67	1.7
Ethylbenzene	ND	-	176	5.6
Methyl tert-butyl ether	ND	-	175	3.5
Toluene	ND	-	412	5.1
Xylenes (total)	0.1	-	680	47.0
Hydrocarbons				
C11-C22 Aromatic Hydrocarbons	11.0	-	3,000	1,300
C19-C36 Aliphatic Hydrocarbons	11.0	-	27,500	1,400
C5-C8 Aliphatic Hydrocarbons	ND	-	2,960	110
C9-C10 Aromatic Hydrocarbons	ND	-	2,530	130
C9-C12 Aliphatic Hydrocarbons	0.2	-	2,320	140
C9-C18 Aliphatic Hydrocarbons	4.6	-	62,900	3,100

ND: Not Detected

Charter and the Site LSP will track the location and elevations where the Imported Soils are placed. This information will be consolidated into an as-built plan for the soil placement that will be incorporated into the Permanent Solution Statement in accordance with the MCP to be prepared by the Site LSP for ELC. The Permanent Solution Statement will include consideration of the concentration of contaminants in the imported soil. The MCP Permanent Solution Statement will have an Activity and Use Limitation (AUL) that will outline the management protocols and procedures for excavation of imported soil as part of future utility and construction worker activities.

2.3 Generator Site Review and Acceptance Procedures

The soils proposed to be accepted and placed at the Site will originate from Generator Site construction and remediation projects where the soils have either been pre-characterized during the engineering phase of the development or characterized from stockpile(s) excavated from the Generator Site. All soils shall be pre-characterized using appropriate characterization guidelines as outlined below.

The following soils may be accepted at the Site during soil acceptance operations:

- Soil from Generator Sites listed under Massachusetts General Law (MGL) Chapter 21E;
- Soil from Generator Sites that are not listed under MGL Chapter 21E;
- Natural soils from Generator Sites that both have or do not have anthropogenic contamination; and
- Uncoated asphalt, brick and concrete rubble to be used for fill amendments, temporary roadways, and other construction purposes.

The accepted soils will be non-putrescible with concentrations of contaminants that will not impact human health, safety or the environment and will not create nuisance conditions such as dust and odors with the implementation of the controls outlined herein. Generally, these soils will not have more than 20% organics by weight. Soils with organics will be reviewed and approved by the Site Geotechnical Engineer for reuse in specific areas.

Construction and demolition (C&D) waste fines or residuals will not be accepted.

Uncoated Asphalt, Brick and Concrete (ABC) rubble processed off-site may be accepted for use as fill amendments, as well as construction of temporary roadways and other related uses. In accordance with MassDEP policies, uncoated ABC must be pre-processed rubble that contains only weathered (cured) asphalt pavement, clay bricks and attached mortar normally used in construction. The rubble shall not be painted, coated or impregnated with any substance. The rubble shall not be mixed with or contaminated by any other wastes or debris. The rubble shall be crushed or processed to a maximum nominal size of three inches. Certain loads of soils received at the Site may have quantities of ABC rubble that can be utilized for similar purposes within the limits of the Site. The imported ABC rubble will be in addition to the ABC materials to be generated from on-site demolition of existing structures at the Site.

The following is a discussion of the procedures that will be implemented to conduct the operations related to the acceptance and placement of soils at the Site. MassDEP will be notified of any significant changes to this FMP.

2.4 General Procedures for Determining Soil Acceptance

The following general procedures for review and acceptance of soils will be implemented during the review and determination of the acceptance of soils from off-site Generator Sites at the Site.

2.4.1 Overview

Soils proposed for re-use at the Site will be tested as outlined below to demonstrate that all parameters meet the Acceptance Criteria as outlined herein. Soils that do not meet the Acceptance Criteria will not be accepted at the Site.

2.4.2 Screening Criteria

Candidate soils from a specific Generator Site must be evaluated by a LSP retained by the Generator Site owner for acceptance at the Site.

Personnel at the Generator Site, under the direction of the Generator Site LSP, will continuously inspect soil that is being excavated and transported off-site for signs of contamination, such as staining, discoloration, odors, container fragments, as well as unacceptable materials, such as solid waste or excessive volumes of ABC materials. All suspect materials will be segregated from the ongoing operations, for further assessment by the Generator Site LSP prior to delivery to the Site.

The following initial screening criteria will be incorporated into a Generator Site Submittal Package that will be reviewed by Site's LSP for completeness and compliance with the Site's Acceptance Criteria. Proposed soils to be accepted shall meet the following field screening and visual criteria at all points during the in-situ pre-characterization effort, stockpile characterization, excavation and the load out phase at the Generator Site:

- Soils approved for use at the Site may contain only incidental, randomly dispersed, less than one percent by volume based on visual observation of ash and/or Solid Waste (e.g. Municipal Solid Waste and/or Construction and Demolition Waste as defined in MassDEP's Solid Waste Management Regulations (310 CMR 19.000)).
- Visually, the soil must not exhibit any staining or other discoloration indicating releases of oil and/or hazardous materials.
- Soils shall not contain any free-draining liquids that cannot be managed within the operating area where they are unloaded. Soils may contain naturally deposited silts, clays and naturally occurring organic materials that have high moisture contents since natural drying of the soil can occur while it is being processed and spread.
- Soils should have the physical properties needed to be placed in a manner that is suitable for the future redevelopment of the Site or can be processed on-Site to be suitable. The suitability of incoming soils and/or the need to amend the incoming soils prior to final placement shall be determined by the Site Geotechnical Engineer.
- Limited volumes of soils mixed with bentonite or other slurry materials may be accepted on a case-by-case basis. A description of the process and materials generating soil with slurry must be provided. The Material Safety Data Sheet (MSDS) for all slurry and any other additive products must be submitted to Site LSP for review. Soils that contain de minimis amounts (based on visual observations of less than one percent by volume) of mixed-in slurry may be accepted for re-use based on review and approval by the Site LSP and Site Geotechnical Engineer.
- Soils received that are odorous that may potentially create an off-site odor condition or may be dusty when unloaded, processed and placed will require additional controls as outlined herein. Soils where odors and dust cannot be controlled will be rejected and further deliveries terminated until the generator at the Generator Site can demonstrate that any potential odor or dust issues have been adequately addressed.

2.4.3 Contents of Soil Profile Packages for Each Generator Site

Prior to transporting any soils to the Site, the Generator Site LSP must submit the following information to the Site Owner and the Site LSP for review and approval:

- Location of the Generator Site and contact information for the Generator Site owner, the generator and their LSP.

- Description of Generator Site history, including current and past uses and a description/source of any release(s) that may have impacted the proposed soil, including the Release Tracking Number(s) (RTNs) associated with release(s) at the Generator Site and abutting parcels where the releases may have impacted the Generator Site.
- Checklist stating that the Generator Site's LSP has evaluated the proposed soils for each of the screening criteria outlined in in this FMP. A copy of the blank checklist is provided in Attachment B. The checklist may be modified during operations.
- Boring logs, test pit logs, or physical description of the material (e.g. sand, silt, clay). Available geotechnical information on the proposed soils.
- Table with analytical results compared to the Acceptance Criteria.
- Site map or sketch showing the location from which the soil/fill will be removed or is stockpiled as well as the location of samples.
- A completed signed Material Shipping Record (MSR) on the form provided by MassDEP.
- Any investigative reports deemed necessary by either the Generator Site LSP or Site LSP to characterize the soils proposed for the Site.
- Soils must be analyzed for the parameters and frequencies outlined in in this FMP. Samples presented for approval shall be a composite representative of the proposed soils. At a minimum, all concentrations of potential contaminants in the soils shall meet the Acceptance Criteria set forth in this FMP and the equivalent frequency of testing requirements is appropriate to demonstrate that the samples represent the proposed soils.
- The Generator Profile on the form attached to this FMP.
- An Opinion Letter signed by the Generator Site LSP. The Opinion letter shall contain the following information:
 - Estimated quantity of soils to be delivered to the Site;
 - Description of the historical use of the Generator Site;
 - Description of the soil characterization sampling program and analytical results, and any field screening analytical data used to support the determination;
 - Physical description of the soil including the soil classification method used;
 - Statement from the generator whether the Generator Site is a listed Disposal Site, as defined in the MCP, or if any releases or spills have occurred on or in the vicinity of the Generator Site which may have affected the site, including the types of oil and hazardous materials spilled/released; and
 - Statement that the Generator has used due diligence, as described in MassDEP's HW93-01 Policy to characterize that the soil does not contain a listed hazardous waste and/or is itself a characteristic hazardous waste.

2.4.4 Generator Site Approval

A request for approval of a Generator Site shall be provided in a letter format with attachments to the Site Owner and Charter who will provide initial review of the potential acceptance of the proposed Generator Site soils.

The submittal package from each Generator Site will be reviewed by the Site LSP to confirm that the proposed soil meets the Acceptance Criteria. The Site LSP shall then prepare an acknowledgement and approval letter addressed to Site Owner and Charter confirming the acceptability of the soils. The letter shall specify the approved quantity, the quantity to be shipped, restrictions (if any), and other pertinent items related to compliance with the FMP and any other permits or approvals.

2.4.5 Soil Tracking Procedures

All soils from a specific Generator Site will be tracked by an on-site representative using a truck weigh scale to be installed at the Site. Records of all soils accepted will be maintained on-site. These records will include information on the source of the material, date of receipt, and weight.

For each approved Generator Site, the Site Owner will track the received volume based on the weight measured at the scale and an assumed density against the quantity approved by the Site's LSP in response to the Generator Site submittal package described above. Additional source testing shall be required if the quantity delivered to the Site exceeds the quantity approved based on the sampling frequencies outlined below or additional soils from areas of the Generator Site not previously presented for approval.

The transportation of all soils to the Site shall be conducted in accordance with the MassDEP's requirements as outlined in the MCP and MassDEP policies.

2.4.6 Acceptance Testing Sample Frequency Requirements

The soils proposed for use at the Site shall comply with the acceptance testing criteria outlined in this FMP. For all Generator Sites, the samples presented shall be representative of the soils to be delivered to the Site as determined by the Generator Site's LSP and approved by the Site LSP. The sampling frequency for proposed incoming soils shall be a minimum of one sample per every 500 cy to be delivered for historic fill soils or other soils with potential anthropogenic contamination and one sample for every 1,000 cy for natural soils. More frequent samples may be required if determined by the Generator Site LSP or the Site LSP.

If any Acceptance Criteria are exceeded in any confirmatory testing performed on incoming soils, supplemental in-situ or ex-situ (stockpile) samples must be obtained at a minimum frequency of one sample per 100 cubic yards delivered to confirm limits of acceptable soils for the contaminant(s) that exceeded the Acceptance Criteria.

2.4.7 ABC Rubble Acceptance Procedures

ABC rubble will be accepted from Generator Sites that is pre-processed off-site and contain only weathered (cured) asphalt pavement, clay bricks and attached mortar normally used in construction. The rubble shall not be painted, coated or impregnated with any substance. The rubble shall not be mixed with or contaminated by any other wastes or debris.

For off-site clean rubble, the generator will provide a certification stating that the rubble is ABC and are not painted or have other coatings and any information on a specific Generator Site including any asbestos or hazardous materials abatement performed. A letter from the Generator Site or Generator will be incorporated into the file documenting review of the certification.

The clean ABC rubble from off-site sources will be pre-processed off-site and crushed to a nominal maximum size of 3-inches. Larger pieces of ABC may be accepted at the Site for specific uses after approval of the Site LSP, Site Geotechnical Engineer and Site Owner.

Coated or painted ABC may also be accepted in accordance with a Beneficial Use Determination (BUD) issued in accordance with the Solid Waste Management Regulations (310 CMR 19.000). The Site Owner is pursuing a BUD for the on-site processing and reuse of the existing ABC materials on the Property.

If unprocessed ABC materials are accepted from off-site sources and processed for re-use at the Site, a General Permit for a Recycling Operation will be submitted to MassDEP and the Everett Board of Health in accordance with section 310 CMR 16.04 of the Site Assignment Regulations for Solid Waste Facilities.

ABC will generally be placed outside of the limits of the area where the other soils are being placed or within a separate stockpile area so that it can be utilized as needed. The quantity of ABC rubble accepted will be limited to the amount needed for roads, site access and to augment the incoming soils.

2.4.8 Other Acceptance Criteria for Soils

All imported soils must meet the following additional requirements:

- Shall not contain free-draining liquids that cannot be managed within the operation area and the stormwater system; and
- Have less than one percent by volume of ash and Solid Waste, as determined by visual inspections.

All imported soils should meet the following additional requirements¹:

- Be granular and composed predominantly of inorganic (mineral) materials to minimize settlement due to decomposition and gas generation;
- Be easy to spread, compact to high density and not readily decompose over time;
- Have a typical maximum nominal size of 3 inches;
- Have a gradation where 50 percent of the material is 3-inches (nominal) or less in size; and
- Organic content shall be less than 20 percent (by weight) on a material specific basis.

2.4.9 Field Screening of Incoming Soils

In addition to laboratory testing, all soil and fill material received must be screened with a Photoionization Detector (PID) meter at a frequency of at least one sample per 50 cubic yards received, using the MassDEP Jar Headspace procedure (MassDEP #WSC-94-400). Field screening results of soil headspace from representative samples that exceed a reading of 10 ppmV (as isobutylene) must either be rejected or further evaluated to ensure compliance with Acceptance Criteria.

2.4.10 Soil Tracking Procedures

Only soils that meet the Acceptance Criteria outlined herein will be accepted at the Site. All soils and ABC rubble will be weighed at an on-site certified scale.

¹ These requirements may be waived by the facility on a case-by-case basis.

The documentation and record keeping procedures ensure that the work is completed in accordance with all applicable regulatory requirements for soils, as well as demonstrate that sufficient information was obtained to verify that the soils and are approved to be accepted at the Site.

Charter will oversee the import and placement of soils and will conduct daily reviews for approved soils and procedures to maintain compliance with the ACO and this FMP, as well as any other applicable approvals. Charter will also maintain daily records for the Site activities, including a summary of all soils accepted, the date and time of receipt, the truck number and name for each delivery truck, the weight of each truck and the total amount of soils received by Generator Site, the physical characteristics of the soils as delivered and the approximate location where the soils were placed at the Site. The quantity of imported soils received each month and the cumulative amount to date will be reported to MassDEP in the monthly reports discussed below.

Additionally, the transportation of all soils (not including ABC rubble) to the Site shall be conducted in accordance with the MSR requirements as outlined in MassDEP policies and regulations, as applicable.

The daily records shall be maintained at the Site and shall be accessible for review by MassDEP at all times.

2.5 Operational Procedures

All soils delivered to the Site will be placed within the limits shown and to the final design subgrades shown on the Plans prepared by VHB and provided in Attachment A.

The final placement of soils shall be coordinated with the ongoing remediation being conducted at the Site in accordance with the MCP Regulations. Soil shall not be placed in an area where they will interfere with ongoing remedial activities. Prior to the placement of soils, the existing structures and infrastructure will be abandoned and removed, and any required initial grading of on-site soils will be completed.

2.5.1 Supervision and Hours of Operation

The acceptance, processing and placement of imported soils will be completed and supervised by the Site Owner, Site LSP and Charter. All of the individuals involved in the operation shall be familiar with the FMP requirements for the soil acceptance and overall operations. In addition, the individuals who will be working at the Site have been involved with other similar soil acceptance and placement operations in Massachusetts.

The hours of delivery of soils at the Site are 7:00 A.M. to 6:30 P.M., Monday through Friday, with on-site earthwork occurring until 7:00 P.M. Saturday, hours of delivery of soils at the Site are 8:00 A.M. to 5:00 P.M. Earlier or later hours of operation will be permitted if approved by the City of Everett or as required to maintain environmental controls. The operator does not anticipate any night work at the Site under normal operations.

2.5.2 Material Unloading

All material unloading will be under the direct supervision of a representative of Charter. Soils will be unloaded either at the location where they will be finally placed or at a temporary processing area. Soils will be placed utilizing the equipment specified herein. Additional or different equipment may be utilized if required by the Site Geotechnical Engineer.

Appropriate signage will be placed and verbal direction via an on-site CB radio with a dedicated channel shall be given to direct delivery vehicles to the active work area. These signs will be mobile and relocated as appropriate.

An on-site representative from Charter will observe the soils as they are unloaded from the delivery trucks. This individual may direct soils to be unloaded in a separate area if they visibly appear to be different than the approved soils or prior deliveries from a specific Generator Site; if the soils have an excessive amount of solid waste or ABC; or if the soils exhibit an odor or have excessive free-draining liquids. Separated soils may either be processed to remove larger pieces of solid waste; sampled to confirm similarity to the approved Generator Site; or re-loaded and removed from the Site.

A set aside area will be designated for the incoming load for the confirmatory sample to be collected during the monthly inspection performed by the Third-Party Inspector. The area shall also have sufficient room to set aside any incoming loads that are noted by the operator as potentially not meeting the Acceptance Criteria outlined herein.

If Charter personnel deem the soils suspect based on visual or olfactory observations or the results of the random confirmatory sampling, the load will be rejected and either sent back to the generator for additional testing or sent to an appropriate permitted off-Site disposal facility. If soils are deemed suspect once placed, the soils will be segregated and tested, to determine whether the Acceptance Criteria is met. If the soils do not meet the Acceptance Criteria, the soils will be shipped back to the Generator Site and/or for disposal at another facility at the Generator's expense.

Pursuant to the FMP, soil and fill materials segregated for soil testing by Site workers, the Project LSP, or the Third-Party Inspector are either accepted and reused, or are rejected and removed from the Property within thirty days of deposition. Loads of soil or fill materials that are rejected as a result of field screening, visual or olfactory inspection or by analytical testing data results (Rejected Materials) shall be removed from the Property within seven days after being rejected. The owner of the Generator Site from which any Rejected Materials was shipped shall be responsible for removing and disposing of such Rejected Materials in accordance with applicable regulatory requirements; however, if such owner fails to remove the Rejected Materials, the Rejected Materials shall be removed by the Site Owner in accordance with applicable regulatory requirements.

2.5.3 On-Site Processing

Soils as received may require further processing to meet the geotechnical requirements for the future redevelopment of the Site. The processing may include temporary stockpiling of soils; screening of soils to remove larger items or meet specific geotechnical requirements; crushing of screened stone; and mixing of screened stone or ABC rubble into the soils. These operations will be performed at a designated location within the drainage area to the stormwater collection and treatment system and with appropriate buffers to abutting residential areas. The location of the on-site processing areas and associated stormwater controls will change during the soil acceptance and remediation program. Stockpiles of soils may be placed on specific areas based on geotechnical requirements consistent with future development.

The location of the processing area may be moved during the soil acceptance operations. The processing area shall be operated to keep imported soils to be utilized for different purposes at the Site separated, as required.

The volume of soils within the processing area shall be minimized and soils shall be placed immediately after processing is completed. The processing area shall be operated to control dust or other nuisance conditions as outlined herein.

2.5.4 Placement of Soils

All soils will be spread and compacted using the on-site equipment. Material shall be placed in lifts not to exceed a maximum one foot in thickness, unless smaller lifts are required by the Site Geotechnical Engineer.

Temporary barricades such as barrels and signage will be used as needed to delineate the unloading of soils at the active work area. The equipment operator shall make a minimum of three passes over all unloaded material with suitable compaction equipment.

2.5.5 Environmental Controls

All construction work associated with the acceptance, processing and placement of imported soils will minimize potential adverse impacts to the environment. Charter plans to mitigate potential on-site and off-site impacts will be mitigated by implementing engineering control measures and Best Management Practices (BMP).

The Site remediation/reclamation activities will be conducted in accordance with environmental mitigation measures contained in the Stormwater Pollution Prevention Plan (SWPPP)² prepared in accordance with the National Pollution Discharge Elimination System (NPDES) program administered by the Environmental Protection Agency (EPA). The SWPPP covers the activities outlined in this FMP including the specific BMPs to be implemented and will be submitted to EPA as required by the NPDES regulations. The SWPPP will be modified based on ongoing operations. A copy of the current SWPPP including all modifications will be available on-site.

2.5.6 Dust Controls

Dust will be controlled so that there is no visible fugitive dust leaving the Site or a nuisance condition. The dust mitigation measures include control of fugitive dust by covering all transport trucks and applying water to surfaces at the Site where dust may be generated. A water truck will be available as needed during operations to apply water and control dust. A water source shall be available at the processing area to control dust during the stockpiling and processing of incoming soils.

The use of a water truck may be suspended during the winter months to avoid creating safety issues at the Site. Alternative dust control measures such as calcium chloride may be used as needed. Additionally, haul roads may be constructed of ABC, recycled asphalt grindings, or paved in order to minimize dust.

A construction entrance(s) consisting of rip rap stone or ABC shall be constructed at appropriate location(s) to control the off-site tracking of soils onto public roadways.

Appropriate equipment for street sweeping will also be available as needed during operations. This equipment will clean paved portions of the Site access road and along the truck hauling route including public roadways as necessary. A wheel wash system may also be installed and operated at the Site to minimize off-site tracking of soil to roads adjacent to the Site.

The Site LSP is developing a dust and vapor monitoring program for the remediation activities in accordance with the MCP Regulations. The results of the dust and vapor monitoring program will be reported to MassDEP as part of the MCP filings for the Site.

² "Stormwater Pollution Prevention Plan, Former Buil Oil Storage Facility, 52 Beacham Street, Everett, Massachusetts," prepared by Haley & Aldrich, Inc. for Charter Contracting Company. Dated March 2024.

2.5.7 Noise Mitigation

Noise associated with the acceptance, processing and placement of soils will comply with MassDEP Noise Pollution Policy (310 CMR 7.00), which requires that noise levels cannot cause a public nuisance. Typical noise sources will include construction vehicles and other construction-related activities as described herein. Site personnel and incoming truck traffic will be directed to limit noise to the greatest extent practical. Drivers will be instructed to minimize noise associated with tailgates closing and the use of transmission brakes both onsite and along the haul route. The significant existing buffer areas between the proposed work area and nearby residential properties as well as the background noise levels from traffic will minimize the audibility of construction activities.

All trucks and construction equipment are required to have operational back-up alarms.

2.5.8 Odor

Placement of the proposed soils should not create off-site nuisance odors. During operations, Charter will determine if odors from the delivered soils are present. If odors from the delivered soils are deemed a potential problem, mitigation measures will be implemented such as mixing odorous soils with clean soils. Soils received that are consistently odorous will be rejected and further deliveries terminated until the Generator Site can demonstrate that any odor issues have been addressed.

2.5.9 Stormwater Management and Erosion Controls

The Site Owner has retained VHB to prepare the phasing plans including the proposed interim stormwater management and erosion controls that will be implemented as part of the soil placement and Site remediation processes. A NOI for the soil import and cover activities was filed with MassDEP, and the Everett Conservation Commission. The NOI summarized the proposed approach to stormwater management during these operations. A copy of the NOI plans for the placement of imported soils and the Order of Conditions issued by the Everett Conservation Commission (MassDEP file number 022-0139) is in Attachment A to this FMP.

The Everett Conservation Commission issued a separate Order of Conditions (MassDEP file number 022-0137) for the removal of the existing Above-Ground Storage Tanks (AST), pipes and buildings and the remediation of in-situ petroleum-impacted soils for the North Tank Farm Area dated May 16, 2024.

Stormwater will be managed under three EPA-approved Dewatering and Remediation General Permits (DRGPs):

- MAG912140 for the North Tank Farm;
- MAG912141 for the South Tank Farm; and,
- MAG912139 for dewatering of concrete bunkers.

Stormwater will also be managed pursuant to the Construction General Permit (CGP) MAR1004Z0 that covers the management of general stormwater discharges. As demolition, remediation and site preparation activities proceed, portions of the existing stormwater treatment system will be decommissioned. This interim condition will be managed with local treatment systems to be operated as needed.

Discharges associated with groundwater, stormwater and surface water related to site remediation will be managed under the DRGPs. Prior to discharge, collected water will be routed through a baffled sedimentation tank and bag filters to remove suspended solids and undissolved constituents, including metals, to within the limits established by the DRGP. Total flow will be measured with a flow

meter/totalizer. If necessary to meet NPDES DRGP Effluent Limitations, supplemental pre-treatment may include oil/water separators, pH control to adjust pH to within the established and/or other components as required .

The DRGPs will apply to localized dewatering during remediation within the North Tank Farm. The CGP will be utilized in tandem with the DRGP to regulate discharges from Site activities including soil disturbance. These discharges will utilize the existing outfall to the Island End River. As each remediation phase is completed, the existing stormwater management systems in that area will be decommissioned, and stormwater will then be managed on site according to the proposed stormwater management system as described in NOI.

The remediation phase drainage design including the acceptance of imported soils follows EPA CGP methodology for management of stormwater, sizing of stormwater management basins, and operations. In the final/post-remediation condition, the drainage design for the Project Site will be developed based on a future development plan and will follow the MassDEP Stormwater Management Guidelines and City of Everett Stormwater Management requirements. Almost the entirety of the existing Site drainage is directed to the existing Beacham Street culvert, which is not a part of the Everett Municipal Separate Storm Sewer System (MS4) system. The remediation phase drainage system and the final developed condition are also planned to be directed to this culvert. The interim post-remediation stormwater management conditions will strive to meet the existing discharge standards for the on-site treatment system.

Additional details on the stormwater system (including supporting calculations) are included in the NOI filed with the City of Everett Conservation Commission and the SWPPP, as revised, for the import and placement of imported soils.

2.5.10 Haul Routes and Traffic

Access to the Site for trucks delivering soils will be from Beachman Street. Trucks exiting the Site will use the same route to leave. The truck route will be developed in coordination with the City of Everett and provided to all trucks entering the Site. Trucks will be directed to use this route only.

Charter will implement a program to monitor compliance with the truck route. Drivers who violate the designated truck routes may be initially suspended from making deliveries for a period of time. Subsequent violations of the truck route by a specific driver or company may result in them being banned from making deliveries to the Site.

The maximum number of trucks per day during the acceptance of imported soils is less than 150 trucks per day.

2.5.11 Access Road Construction and Maintenance

Charter will maintain the Site access road and right-of-way to the working area. On paved sections of roadways, Charter will promptly make repairs to potholes and remove all debris as appropriate for continued access and safety. In addition, the paved portions of the access roadways and public roads along the specified haul route will be swept as needed to control dust and any off-site migration.

A certified truck scale shall be installed at a location where it can operate and not create queuing of incoming trucks onto public roadways. The scale shall be suitable for weighing trucks delivering soils to the Site. A temporary office space will be placed adjacent to the scale for on-site personnel. The location of the access road, truck weighing scale and office trailer may be changed during operations.

2.5.12 Equipment and Equipment Shelter

Charter or its contractor will have at a minimum, the following equipment available for soil acceptance, processing and placement activities:

- Caterpillar D-6 LGP bulldozer or equivalent in size and work capacity. A larger bulldozer may be provided to place and compact soils in-place.
- GMC 4000-gallon water truck or equivalent in size and work capacity.
- Elgin Street sweeper or Bobcat loader with sweeping attachment as needed for specific tasks.

As needed, the following additional equipment will be provided:

- Volvo A-35 end dumps or equivalent in size and work capacity.
- Volvo LC-150 Front-End Loader
- Komatsu PC-400 excavator or equivalent in size and work capacity.
- Additional equipment as needed to process incoming soils and compact soils as required for the redevelopment of the Site.

Durable equipment capable of performing the tasks to be completed each day will be used. A preventative and corrective maintenance program with the on-site equipment will be implemented to minimize breakdowns and downtime. Back-up equipment will be available for use as needed.

Any and all vehicle maintenance and fueling will occur outside any areas where spills could impact sensitive receptors.

If back-up or replacement equipment is not available, Charter may cease accepting, processing or placing soils until such time that appropriate equipment is available.

2.5.13 Staffing

Equipment operators will be licensed to operate all of the equipment provided at the Site. An adequate number of equipment operators will be provided to operate the required equipment in accordance with this FMP.

An attendant will monitor incoming loads, collect and process the shipping forms from drivers, weigh all incoming and outgoing vehicles, inspect trucks prior to exiting the Site, and control access to the Site. Additional employees to inspect loads or any of the other requirements for the operations at the Site will be provided as necessary.

2.5.14 Employee Facilities

Portable toilet facilities will be provided at the Site for use by all personnel. Bottled water will be provided in an office trailer/scale house located at the Site. This trailer will be sufficiently heated and have appropriate lighting and telephone service as well as internet access.

2.5.15 Accident Prevention and Health and Safety Plan

All personnel at the Site will be appropriately trained in the principles of first aid and safety and the specific operational requirements to prevent accidents in their respective jobs.

First aid kits will be provided at the Site for use by employees. The emergency phone numbers at the Site for Ambulance, Fire Department and Police are 911. This number will be posted in the office trailer/scale house.

2.5.16 Site Security

Access to the Site will be restricted by gate(s) and additional fencing to be constructed at appropriate locations. “No Trespassing” signs will be posted at the gate. A sign at the Site will identify the Site Owner and Charter and provide emergency phone numbers.

If unauthorized access becomes an issue, the Site Owner will install appropriate additional security measures to further limit access by vehicles and trespassers.

2.5.17 Inspections and Confirmatory Sampling

For every day that acceptance and placement of imported soils is being undertaken on the Site, Charter will conduct a daily inspection and assessment of the status and condition of the Site including any structures, equipment, devices, stormwater management controls environmental control systems, paved surfaces, and fencing. This shall include monitoring of the operations for any nuisance conditions including odors, dust and stormwater run-off. The information from this inspection as well as documentation as to soils receipt and placement shall be compiled in a daily log. The daily log shall summarize any observations from the inspection and corrective actions undertaken to correct them.

On a weekly basis, a qualified employee of Charter familiar with similar soil acceptance and remediation projects shall conduct a review of the daily logs as well as an inspection of the overall Site operations. The results of this inspection shall be summarized in a weekly log to be prepared by this individual. A copy of this weekly review will be maintained on-Site.

A monthly randomly scheduled, unannounced inspection of the operations shall be completed by Site Owner’s Third-Party Inspector as defined in the ACO. Monthly third-party inspections will be conducted by an independent LSP, Professional Engineer (P.E.), Qualified Environmental Professional (QEP), or another QEP approved by MassDEP and contracted by the Site Owner. The Third-Party Inspector will conduct unannounced and random inspections during normal operating hours. The independent and random testing protocol is provided herein. While onsite, the Third-Party Inspector will perform the following tasks:

- Observe the practices involved in the receipt and/or placement of soil and fill materials at the Site, to the extent that such activities are occurring;
- Inspect the soil and fill materials that are being unloaded and/or placed/recently placed during the inspection, if any, and inspect all areas of the Site where soil and fill materials have been placed since the previous inspection;
- Collect a grab sample of any area or load of soil that appears to be contaminated, based upon staining, discoloration, odors, or PID readings. If no area or load appears to be contaminated, collect a composite soil sample from a minimum of one load of soil being delivered or recently delivered to the Site and submit the collected samples to a laboratory for the soil profile analyses specified in the FMP. The composite sample shall consist of a minimum of 5 to 10 subsamples from the load(s) under evaluation. If a load has been selected by the Third-Party Inspector for sampling, the load will remain in a holding bay until the laboratory results have been received and reviewed;
- If no soil and/or fill materials have been accepted since the last monthly inspection and there is no area that appears to be contaminated based on the Third-Party Inspector’s observations, a monthly sample will not be taken; and

- Inspect all erosion control measures including but not limited to silt fence, hay bales, temporary basins and swales.

2.5.18 Monthly Reporting

Monthly reports shall be submitted via email to MassDEP by the 21st of each month for the previous calendar month. The monthly reports shall be submitted monthly using eDEP Transmittal Form BWSC 126, Section B (2), under the existing Release Tracking Number (RTN) 3-0000310.

The monthly reports shall include the following:

- The total tons of soil received by the Site in the previous month; the total tons of soil received by the Site since the signing of the ACO; and the estimated total tons of capacity remaining at the Site.
- A tabulation showing the origin/addresses of the sources of soil received during the previous month:
 - The total tons received for the month from each address.
 - A notation on whether the required PID screening at 1 sample/50 cubic yards was conducted at the point of generation or point of unloading at the Site, and affirmation that soil with headspace concentrations >10 parts per million by volume (ppmv) was either rejected or approved after further evaluation by an LSP/QEP from each address.
- A notation on any problems or issues experienced during the previous month; any noteworthy activities expected in the upcoming month, and any significant changes in the project design, schedule, or on-property contact persons.
- A report by the Third-Party Inspector, to include:
 - Observations of practices that are not compliant with the FMP and/or Consent Order;
 - Observations of solid or hazardous waste, stained soils, odors or sheens;
 - Observations on airborne dust and dust control measures employed;
 - Specific recommendations for repair, replacement or changes to erosion control measures at the Property;
 - Status updates of actions taken by Respondent to implement the recommendations made in prior inspection reports, if any; and
 - Results and laboratory analytical report(s) for the soil sample(s) collected during the inspection, including, but not limited to the following, providing that the testing results for a given inspection may be submitted in the next monthly report if not available for submittal with the inspection report:

- The analytical results in a tabular format comparing the results to the Acceptance Criteria identified in the FMP.
- A clear statement regarding whether any of the Acceptance Criteria were exceeded.
- The laboratory analytical reports and chain-of-custody documentation.
- Any other information or data deemed to be significant and/or noteworthy by the Site Owner, Charter, the Site LSP, or the Third-Party Inspector.

Section 3

Groundwater Monitoring and Other Considerations

3.1 Groundwater Monitoring and Reporting

Groundwater will be periodically sampled to monitor that imported fill materials brought to the Site have not significantly impacted groundwater quality. Baseline conditions will be established using samples collected from the monitoring wells shown on Figure 3 to be analyzed for the following baseline parameters³:

- Extractable and Volatile Petroleum Hydrocarbons (EPH/VPH) by MassDEP EPH/VPH Methods
- VOCs by EPA 8260
- MCP 14 Metals by EPA 6010/7000 (Dissolved)
- PCBs by EPA 8082
- Herbicides by EPA 8151
- Pesticides by EPA 8081

The analysis will be performed by a MassDEP-certified laboratory for the chemical analyses required. MassDEP CAM methods must be used for all analytes that have CAM Methods. Reporting criteria must be low enough to allow comparison to Reportable Concentrations. Water quality samples shall be collected, labelled, and preserved in accordance with established protocols for the respective analysis, and submitted to the analytical laboratory under chain of custody procedures.

The results of the baseline groundwater monitoring event will be reported to MassDEP as part of the monthly inspection report for the month following when the results are available.

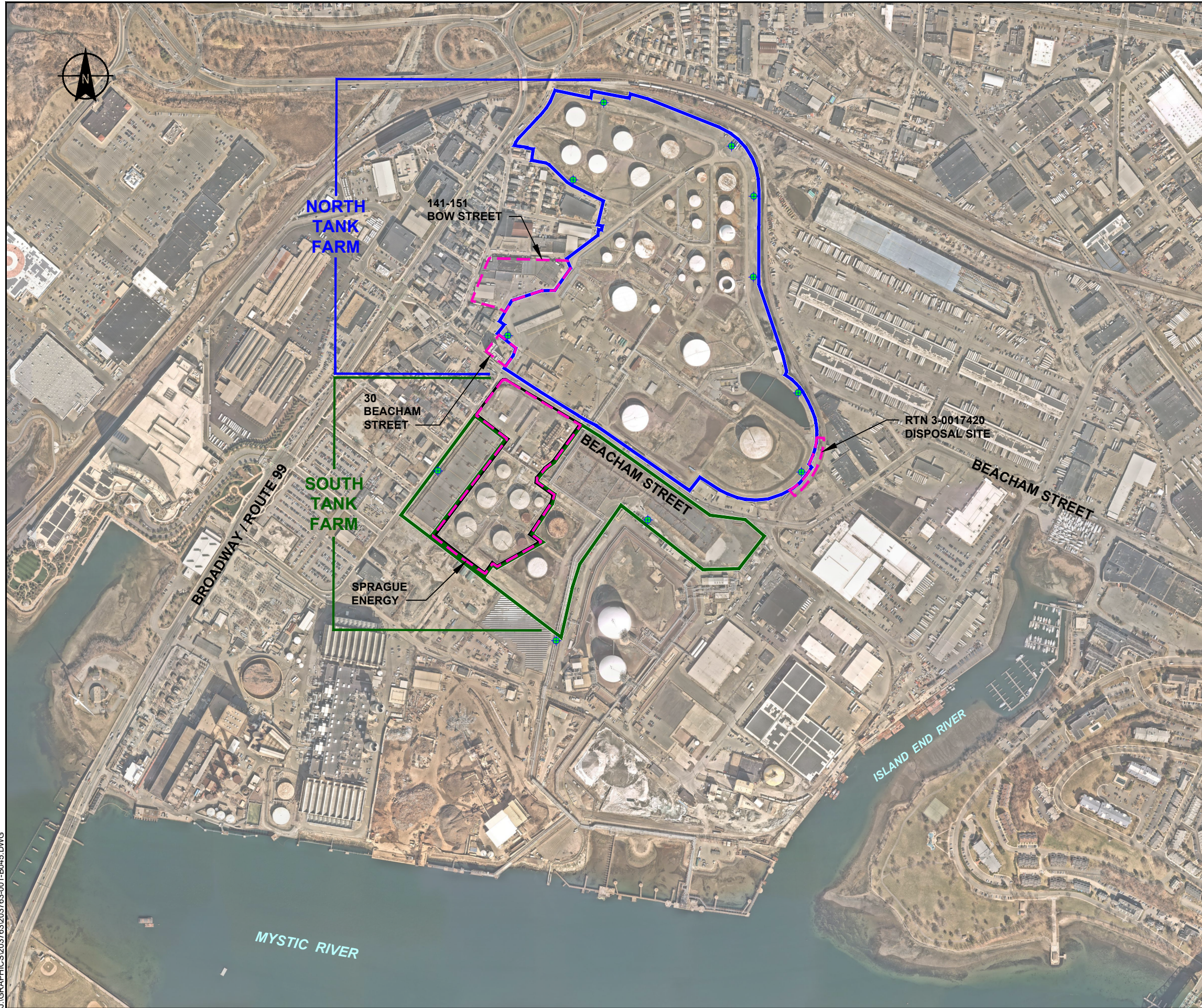
Starting one year after the initial baseline monitoring event, groundwater samples will be collected annually from the same monitoring well locations for laboratory analysis. Groundwater samples collected as part of the annual groundwater monitoring event must be analyzed for the following parameters:

- EPH/VPH by MassDEP EPH/VPH Methods
- VOCs by EPA 8260

If PCBs, Pesticides or Herbicides are detected in the sample(s) collected during the baseline monitoring event, they will be added to the annual groundwater monitoring program for the monitoring well location where they were detected. The results of the annual groundwater monitoring program will be submitted to MassDEP as part of the monthly inspection report for the month following when the results are available.

Groundwater monitoring will continue annually until completion of the acceptance of soils in accordance with this FMP in the ACO. As portions of the Site achieve the targeted soil import elevations, groundwater monitoring will be terminated in those areas to allow for the filing of Partial Permanent Solutions.

³ PCBs, Herbicides and Pesticides have historically been sampled in groundwater and have not been detected.



**HALEY
ALDRICH**

42-148 BEACHAM STREET
EVERETT, MASSACHUSETTS

PROPOSED GROUNDWATER MONITORING LOCATIONS

SCALE: AS SHOWN
AUGUST 2024

Two years after completion of the soil acceptance at the Site, the baseline groundwater monitoring wells will be sampled and tested for the full analyte list utilized in the baseline sampling round.

The groundwater monitoring wells sampled as part of this program may be abandoned and relocated during soil filling to accommodate development of the Site. If a groundwater monitoring well included in this program is abandoned, a new replacement well will be installed in a nearby location and at the same depth as the abandoned well.

3.2 Other Considerations

Within the Site, there are 18 concrete bunkers that will be managed in place and filled with either soils imported under this FMP or other inert materials. The location of the bunkers on the Site is shown on the attached Figure 4. As described below, a portion of the existing bunkers are to remain in place and be structurally supported.

- The bunkers have been largely out of service since the 1960s, and 16 of 18 of the subject bunkers were previously cleaned according to ExxonMobil records. The subsurface areas around the bunkers have been investigated and will be remediated, as required, as part of achieving a Final Permanent Solution for MCP Disposal Site RTN 3-0000310.
- The walls of several of the concrete bunkers support Beacham Street, Sprague Street (private roadway) and Robin Street. Removal of the concrete bunkers in their entirety will endanger the structural integrity of Beacham Street, Sprague Driveway and Robin Street, other structures, and the above- and below-grade utilities within the roadways.
- The bunker walls to remain will be temporarily reinforced to allow for limited demolition of the bunkers, including demolition of the bunker roofs, interior columns, and bunker walls required to be removed to support long-term site development and remediation. The bunker floor slabs are planned to be left in-place and will be cored to allow for infiltration of rainwater and for the groundwater table to equilibrate.

Prior to the reuse of the concrete from the bunkers at the Site, the Site LSP will confirm that materials are not mixed with or significantly contaminated by wastes. Notice will be given to the MassDEP and the Everett Board of Health at least 30 days prior to the start of on-Site processing. The concrete will be processed at the Site so that all rebar is removed and the largest diameter of any piece of rubble is less than six inches unless the specific reuse at the Site requires larger sized pieces. The concrete rubble will not be accumulated at the Site and will be reused within six months of its generation.

Records documenting the processing of concrete and demolition of portions of the bunkers will be maintained by the Site Owner for a minimum of three years.

