



**IMMEDIATE RESPONSE ACTION PLAN
FORMER GLOUCESTER GAS LIGHT CO.
MANUFACTURED GAS PLANT
HARBOR LOOP
GLOUCESTER, MASSACHUSETTS**

PREPARED FOR:

National Grid
Waltham, MA

PREPARED BY:

GZA GeoEnvironmental, Inc.
Portland, Maine

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Table 1 Groundwater and Product Monitoring Summary

FIGURES

Figure 1 Site Plan

APPENDIX

Appendix A Release Notification Form (Form BWSC-103)

Appendix B IRA Plan Transmittal Form (Form BWSC-105)



1.0 INTRODUCTION

This Immediate Response Action (IRA) Plan was prepared by GZA GeoEnvironmental, Inc. (GZA) on behalf of National Grid to address the presence of Dense Non Aqueous Phase Liquid (DNAPL) on the Former Gloucester Gas Light Company Manufactured Gas Plant (MGP) site located along Harbor Loop in Gloucester, Massachusetts (hereafter referred to as the “Site”). The Site is listed with the Massachusetts Department of Environmental Protection (MassDEP) under Release Tracking Number (RTN) 3-25126.

The presence of DNAPL with a measured thickness of approximately six inches was detected for the first time at the Site on October 29, 2009 in a monitoring well that is screened within bedrock. This monitoring well, MW-204B, was being gauged as part of on-going Phase II Comprehensive Site Assessment activities at the Site. Well MW-204B is located on Lot 9-14, which is identified as 19R Harbor Loop by the City of Gloucester Assessor’s Office and is also known as part of the Solomon Jacobs Park. The location of MW-204B is shown on **Figure 1**.

The presence of DNAPL in the subsurface at a thickness greater than ½ inch is a condition that requires notification within 72 hours to the MassDEP in accordance with the Massachusetts Contingency Plan (MCP), specifically 310 CMR 40.0313(1). Consequently, the condition was reported to the MassDEP on October 30, 2009 at approximately 12:50 PM. In accordance with 310 CMR 40.0412(2), an IRA is required at Sites where a condition requiring notification to the MassDEP within 72 hour has been identified. As such, at the time of notification, the MassDEP was informed that IRA activities would be conducted at the Site to address the presence of DNAPL observed in MW-204B. MassDEP indicated that these IRA activities could be conducted under the existing RTN (3-25126) rather than issuing a new RTN. The IRA activities, as proposed to the MassDEP at the time of notification, are outlined in this IRA Plan.

This IRA Plan was prepared in accordance with the requirements of 310 CMR 40.0424 for submittal to the MassDEP. In addition, this IRA Plan was coordinated with the scope of work and schedule recently submitted for the Supplemental Phase II¹. The content of this IRA Plan has been structured to address the specific information requirements set forth in 310 CMR 40.0424 (1)(a) through (j). A release Notification Form (Form BWSC-103) is included in **Appendix A**. The original IRA Transmittal Form (form BWSC-105) accompanies this IRA Plan; a copy of this form is included in **Appendix B**.

2.0 CONTACT INFORMATION

This section of the IRA Plan is intended to address the specific information requirements set forth in 310 CMR 40.0424 (1)(a), which requires the name, address, telephone number and relationship to the site of the person assuming responsibility for conducting the IRA.

Lot 9-14, on which the DNAPL was observed, is currently owned by the City of Gloucester. National Grid is undertaking, and intends to continue to undertake, response actions (i.e., this IRA) required by the MassDEP under Massachusetts General Law (MGL) Chapter 21E and the MCP, with respect to residual MGP contamination at this Site.

¹ GZA, December 15, 2009, Scope of Work, Supplemental Phase II Comprehensive Site Assessment, Former Gloucester Gas Light Company Manufactured Gas Plant, Gloucester, Massachusetts, RTN No. 3-25126.



The contact person, address, and telephone number for National Grid is as follows:

Name: Michele Leone
Manager Site Investigation and Remediation Group

Address: National Grid
40 Sylvan Road
Waltham, MA 02451-1120

Telephone Number: (781) 907-3651

This information is also provided in the attached IRA Transmittal Form (form BWSC-105). A copy of this form is included in **Appendix A** of this IRA Plan.

3.0 RELEASE DESCRIPTION AND SITE CONDITIONS

This section of the IRA Plan is intended to address the specific information requirements set forth in 310 CMR 40.0424 (1)(b), which requires a description of the release or threat of release, site conditions, and surrounding receptors.

3.1 SITE BACKGROUND

This Site was the location of the Former Gloucester Gas Light MGP facility. The Site was first reported to the MassDEP in August 2005 when a Condition of Substantial Release Migration (SRM) was detected. During drilling operations through a pier that was originally part of the former MGP facility, a sheen was observed on the Gloucester Harbor surface water that appeared to be emanating from around the drill casing. The pier is located on Lots 9-16 and 9-14, which are identified as 19 Harbor Loop and 19R Harbor Loop, respectively, by the City of Gloucester Assessor's Office. Upon notification of the SRM condition to the MassDEP, the MassDEP assigned RTN 3-25126 to this release.

A Phase I Initial Site Characterization Report and Tier Classification Submittal (Phase I) was previously prepared by EECS, Inc. (EECS) on behalf of National Grid and submitted to MassDEP in August, 2006². Based on the findings of the Phase I, EECS initiated a Phase II Comprehensive Site Characterization (Phase II) of the facility. Field investigatory activities in support of the Phase II have been performed and/or are on-going. The detection of DNAPL occurred during these ongoing Phase II activities.

3.2 RELEASE DESCRIPTION

As mentioned previously, the release condition requiring this IRA is the measurement of approximately six inches of DNAPL in monitoring well MW-204B; this is the first time a measurable thickness of NAPL has been detected in a monitoring well at the Site.

Monitoring wells MW-204A and MW-204B were installed as a multi-level overburden and bedrock groundwater monitoring well couplet as part of the ongoing Phase II activities in October and December 2008, respectively. These wells were installed in the northern portion of the

² EECS, August 2006, Tier I Permit Application and Tier Classification Submittal, Former Gloucester Gas Light Company Manufactured Gas Plant, Gloucester, Massachusetts.



Solomon Jacobs Park in the vicinity of two structures associated with the former MGP, which are identified as gas holders Nos. 1 and 2 on **Figure 1**, to assess soil and groundwater conditions within the former MGP footprint. MW-204B is constructed with the screened interval set in bedrock from 50 feet below ground surface (bgs) to 60 feet bgs. The well is constructed of two-inch diameter schedule 40, 0.010-inch slotted PVC screen attached to solid 2-inch schedule 40 PVC riser pipe.

On October 29, 2009, while gauging MW-204B, GZA detected the presence of DNAPL with a measured thickness of approximately one half foot. The DNAPL was detected using an electronic oil/water interface probe. The DNAPL was observed to be a black, viscous material with a strong coal tar like odor. This IRA Plan was prepared to address the detected DNAPL condition.

3.3 SITE CONDITIONS

Unless otherwise specified, the information presented in this section is based on EECS's 2005 Immediate Response Action Plan³ for the previous SRM conditions identified at the Site (i.e., sheen at the pier at Lot 9-14 and Lot 9-16) and EECS's 2007 Scope of Work for Phase II – Comprehensive Site Assessment⁴.

3.3.1 Surface Features, Topography, and Property Uses

The Site is generally flat with a slight decline to Gloucester Harbor to the southeast. The ground surface of Lot 9-14 is primarily covered with topsoil and grass with some areas of pavement and a small concrete covered area adjacent to the seawall located along Gloucester Harbor. Lot 9-14 is currently owned by the City of Gloucester and is used for open space that is identified as the Solomon Jacobs Park. A building and surrounding bituminous pavement cover the majority of the ground surface of the adjacent Lot 9-16. Lot 9-16 is owned by National Grid.

The Site is located within a heavily used, industrialized, waterfront area of Gloucester. The Site is abutted to the southwest by the Gloucester Station of the United States Coast Guard, to the northwest by another park known as the Fitz Hugh Lane House, to the northeast by an aquarium and working railway boat launch known as the Maritime Heritage Center, and to the southeast by Gloucester Harbor.

As mentioned previously, Lot 9-14 and Lot 9-16 were formerly part of a MGP facility that operated during the late 1800s and early 1900s. The approximate boundary of the former MGP facility is shown in **Figure 1**.

3.3.2 Regional and Site Geology and Hydrology

Based on the available Site data, the overburden soil in the area generally consists of approximately 5-15 feet of urban fill overlying naturally stratified deposits. Bedrock at the Site consists of Cape Ann Granite.

Based on the Phase II Site explorations performed to date, groundwater at the Site is tidally influenced. The extent of this influence, or tidal flux, has not yet been characterized. The depth to

³ EECS, October 2006, Immediate Response Action Plan, Gloucester Former MGP Facility, Harbor Loop, Gloucester, Massachusetts, RTN No. 3-25126.

⁴ EECS, April 2007, Scope of Work for Phase II Comprehensive Site Assessment, Former Gloucester Manufactured Gas Plant, Harbor Loop, Gloucester, Massachusetts.



groundwater on Lot 9-14, where MW-204B is located, ranges from approximately 7 feet to 10 feet below the ground surface (**Table 1**). Visual evidence of the high tide line on the seawall on Lot 9-14 is located approximately 3 feet below the ground surface. Based on the surface topography and available water level information, shallow groundwater flow in the vicinity of the former MGP is expected to be towards Gloucester Harbor to the southeast.

3.3.3 Regional Environmental Assessment

The area surrounding the former MGP was and still is heavily industrialized. The shoreline of this part of Gloucester contains numerous piers, wharfs, warehouses, boatyards, marine railways and other potential sources of contamination.

According to the Coast Guard Downgradient Property Status Submittal (DPS), “creosote oil”, which was later reported as coal tar, was observed during the driving of a pile in the southeast corner of adjacent Lot 9-13 within Gloucester Harbor. The “creosote oil” was apparently released from bedrock fractures encountered during drilling operations at a depth of 16 to 23 feet below the bedrock surface. The MassDEP assigned RTN 3-23063 to this release. The DPS indicated the possible source of the “creosote oil” as the former MGP even though the material was first identified by one laboratory as #2 fuel oil and later identified as “creosote oil” with minor amounts of #2 and #6 fuel oil.

Lot 9-17, the property that abuts Lot 9-16 to the northeast, is also a MassDEP-listed disposal site. This property is identified as the Marine Railways site (also known as the Maritime Heritage Center) and was assigned RTN 3-3341 by the MassDEP. Contaminants including metals (including tin), petroleum hydrocarbons, and polycyclic aromatic hydrocarbons (PAHs) were apparently detected in soil and sediment at this Site.

3.4 SURROUNDING RECEPTORS

One surface water body, Gloucester Harbor, is located within 500 feet of the Site. No other surface water bodies, including ponds, lakes, streams, rivers, and reservoirs, are located within 500 feet of the Site. GZA consulted the MassDEP MCP (21E) Maps, available at the Massachusetts Geographic Information System (MassGIS) Online Mapping website – <http://www.state.ma.us/mgis/mapping.htm>, December 2009. The MassGIS map shows there are no Areas of Critical Environmental Concern, Sole Source Aquifers, Habitats of Species of Special Concern, or Threatened or Endangered Species within 500 feet of the Site. There are no wetlands located on the former MGP parcels. However, part of the former MGP is located within the 100-foot buffer zone beside Gloucester Harbor.

According to the MassDEP MCP (21E) Map, the Site is not within a Zone II⁵ or Interim Wellhead Protection Area (IWPA);⁶ is not within the Zone A⁷ of a Class A Surface Water Body; is not above a medium-yield or high-yield potentially productive aquifer which may be used for potable water supply.

⁵ Zone II means the area of an aquifer that contributes water to a well under the most severe pumping and recharge conditions that can be realistically anticipated, as approved by MassDEP’s Division of Water Supply, pursuant to 310 CMR 22.00.

⁶ IWPA means: (1) with respect to public water supply wells and wellfields whose pumping rate is 100,000 gallons per day or greater and for which MassDEP has not approved a hydrologically delineated Zone II, the 1/2-mile radius surrounding such a well or wellfield; and (2) with respect to public water supply wells and wellfields whose pumping rate is less than 100,000 gallons per day and for which MassDEP has not approved a hydrologically delineated



According to the City of Gloucester Engineering Department, residents are provided public water from the City of Gloucester. The City of Gloucester receives the water from several reservoirs located in Gloucester greater than one mile from the Site. Given the information that the groundwater in the vicinity of the Site is tidally influenced and potentially brackish, it is likely that no public or private water supply wells would be located within 500 feet of the Site (EECS, 2005).

There are two parks located on the properties that once comprised the former MGP facility. However, there are no facilities for active recreation located within these parks (EECS, 2005). One park is located on Lot 9-14 and the other is located on Lot 9-25. The areas associated with the two parks are designated as Protected Open Space according to the 21E Map. No other institutions, schools, playgrounds, recreational areas or parks are located within 500 feet of the Site.

Because the Site is occupied, workers are expected to be present on the Site. The number of workers is estimated to be less than ten. In addition, City of Gloucester employees periodically visit the site to perform maintenance or other duties associated with landscaping (EECS, 2007).

Critical Exposure Pathways are not present at the Site because no pre-schools, daycares, schools, or occupied residential dwellings are located on or near the Site (i.e., within 500 feet of the Site). The residential population within a one-half mile radius of the Site is estimated to be between 100 and 1,000 people (EECS, 2007).

4.0 IRA DESCRIPTION, PURPOSE, AND OBJECTIVES

This section of the IRA Plan is intended to address the specific information requirements set forth in 310 CMR 40.0424 (1)(c) through (e), which requires a description of Immediate Response Actions undertaken to date at the site; the reason why an Immediate Response Action is required; and the objective(s), specific plan(s) and proposed schedule for the Immediate Response Action, including, as appropriate, plans and/or sketches of the site and proposed investigative and/or remedial installations.

4.1 IRA ACTIVITIES TO DATE

Two IRAs were previously completed to address the presence of petroleum sheens on the surface water of Gloucester Harbor. IRA Completion Reports for these activities were submitted to the MassDEP in June 2006⁸ and February 2009⁹.

As proposed to the MassDEP at the time of notification of the release, the IRA activities undertaken to date to address the DNAPL in MW-204B have been the assessment of the DNAPL and periodic recovery of the free phase product. Assessment activities were initiated on November 21, 2009 and have included the periodic monitoring of the thickness of the DNAPL and the groundwater depth in MW-204B. The presence of the DNAPL was detected using an electronic oil/water interface probe and confirmed using a bailer. In addition, free phase product has been

Zone II, the radius calculated by multiplying the maximum pumping rate in gallons per minute for such a well or wellfield by 32 and adding 400 feet thereto.

⁷ Zone A means the area within 400 feet laterally from the bank of a Class A surface drinking water source (as identified in 314 CMR 4.00) or within 200 feet of its tributaries.

⁸ EECS, June 2006, Immediate Response Action Completion Report for Gloucester Former MGP Facility, Harbor Loop, Gloucester, Massachusetts, RTN No. 3-25126.

⁹ EECS, February 2009, Immediate Response Action Completion Report for Gloucester Former MGP Facility, Harbor Loop, Gloucester, Massachusetts, RTN No. 3-28213.

recovered from the well using hand bailing methods. A summary of groundwater and NAPL monitoring activities performed to date in well MW-204B, as well as nearby wells MW-204B, and MW-102, is provided in **Table 1**.



4.2 REASON FOR IRA

Pursuant to 310 CMR 40.0412(2), an IRA is required to address “72-hour” notification conditions. Since the presence of DNAPL at MW-204B resulted in a “72-hour” notification (310 CMR 40.0313), an IRA is required to address the “72-hour” reporting condition.

The presence of the free phase product within well MW-204B was detected at approximately 1430 hours on October 29, 2009. The condition was subsequently reported by EECS, Inc. to the MassDEP at 1250 hours on October 30, 2009, which is within the regulatory deadline of 72 hours. Since the Site has already been assigned RTN 3-25126 by the MassDEP, no additional RTN was issued for this release.

At that time, the MassDEP approved IRA activities including bailing of the DNAPL and gauging of well MW-204B on a weekly basis for the first two weeks, followed by monthly monitoring based on the preliminary monitoring results. DNAPL monitoring and bailing activities were subsequently initiated on November 21, 2009 due to unforeseen delays associated with access.

4.3 IRA OBJECTIVES, PLANS, AND SCHEDULES

The objective of this IRA is to continue to assess the release by monitoring the DNAPL in MW-204B and to remove the free phase product by hand bailing until the thickness of the free phase product is equal to or less than 1/2 inch.

DNAPL monitoring and removal activities will continue on a monthly basis if the free phase product is not greater than ½ inch. MW-204B will be gauged for groundwater level and the presence of DNAPL. If the well contains DNAPL greater than ½ inch, the DNAPL will be bailed to remove the accumulated DNAPL. The well will be re-gauged one week later to assess DNAPL accumulation rates. After two consecutive months of DNAPL thickness measurements less than ½ inch, the IRA will be completed.

As indicated in **Table 1**, approximately seven weeks of DNAPL monitoring and recovery actions have been completed at the Site to date. During this period, the DNAPL layer thickness measured in well MW-204B has decreased from approximately 0.5 feet on October 29, 2009 to less than measureable on December 16, 2009. During this period, less than approximately one pint of DNAPL was recovered from the well. DNAPL has not been detected in the well since December 1, 2009. As discussed in subsequent sections of this report, the combined DNAPL and groundwater removed from the well has been containerized and temporarily stored at a more secure National Grid owned property located near the Site on Rogers Street.

If the IRA cannot be completed by February 28, 2010 (i.e., within 120 days of notification of the release to the MassDEP), an initial IRA status report will be prepared and submitted to the MassDEP in accordance with the requirements of 310 CMR 40.0425. Subsequent IRA Status Reports will be submitted to the MassDEP every six months thereafter until the IRA is completed. Upon completion of the IRA, an IRA Completion Report will be prepared and submitted to the MassDEP in accordance with the requirements of 310 CMR 40.0427.



The DNAPL release will be further evaluated relative to potential Imminent Hazard (IH), Critical Exposure Pathway (CEP), and Substantial Release Migration (SRM) conditions. According to EECS (2005), these conditions do not currently exist at the Site. More specific information relative to these issues will be presented as part of a future IRA Status or Completion report submittal.

Further response actions to evaluate the nature and extent of contamination present on the properties that comprised the former MGP facility will be conducted as part of the supplemental Phase II Comprehensive Site Assessment activities being conducted on the Site.

5.0 OTHER INFORMATION

This section of the IRA Plan is intended to address the specific information requirements set forth in 310 CMR 40.0424 (1)(f) through (j), which requires a statement as to whether Remediation Waste will be excavated, collected, stored, treated, or re-used at the site; where appropriate, a proposed environmental monitoring plan, for implementation during and/or after the Immediate Response Action; a listing of federal, state, or local permits that will likely be needed to conduct the Immediate Response Action; except as exempted pursuant to 310 CMR 40.0411(2), the seal and signature of the Licensed Site Professional who prepared the Immediate Response Action Plan; and such other information as the Department may deem appropriate and necessary, based on site specific conditions, in order to review and evaluate the Immediate Response Action Plan in question.

5.1 REMEDIATION WASTES

Remediation Waste will be generated as a result of the IRA activities. The Remediation Waste includes the DNAPL (Uncontainerized Waste) and contaminated groundwater (Contaminated Media) recovered from MW-204B and the disposable personal protective equipment (PPE) and bailing/sampling equipment (Contaminated Debris) impacted by the DNAPL during the assessment activities.

The DNAPL and groundwater recovered from MW-204B and the Contaminated Debris described above will be stored in separate Department of Transportation (DOT)-approved drums at the National Grid-owned property located near the Site at 109 Rogers Street. The drums will be stored at this National Grid facility because the Solomon Jacobs Park is a public park and the drums would be accessible by the general public at this location. The National Grid facility provides a level of security since the property is surrounded by a chain-link fence topped with barbed wire and access is restricted with a locked gate. The drums will be stored in a designated area that is covered with asphalt pavement.

Since the wastes will be temporarily stored at an off-site location, the drums will be transported to an approved disposal facility under a hazardous waste manifest or other approved shipping document within 90 days of initial generation of the contents if the generated wastes meet the criteria for a characteristic hazardous waste or within 120 days if the materials do not meet this criteria. Waste manifests or other shipping documents (as required) for these materials will be included in an IRA Status or Completion report submittal following final disposal.



5.2 ENVIRONMENTAL MONITORING PLAN

Standard health and safety precautions (e.g. use of personal protective equipment) will be followed during implementation of the IRA; however, a separate environmental monitoring plan is not proposed at this time. Equipment coming in contact with DNAPL will be dedicated to the site location (e.g. the bailer within MW-204B) or properly cleaned between locations.

5.3 PERMITS

At this time, GZA does not anticipate that any permits are required to perform the IRA activities outlined in this plan.

5.4 LSP INFORMATION

This information is provided on the attached IRA Plan Transmittal Form. A copy of this form is also included in **Appendix B** of this IRA Plan.

5.5 ADDITIONAL INFORMATION

If additional information is needed or questions regarding this plan arise, please contact Matthew Barvenik at (781) 278-3805.

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TABLE 1
Groundwater and Product Monitoring Summary

Table 1
IRA Groundwater and Product Monitoring
Former Gloucester Gas Light Company
Gloucester, Massachusetts

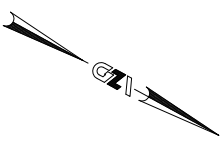
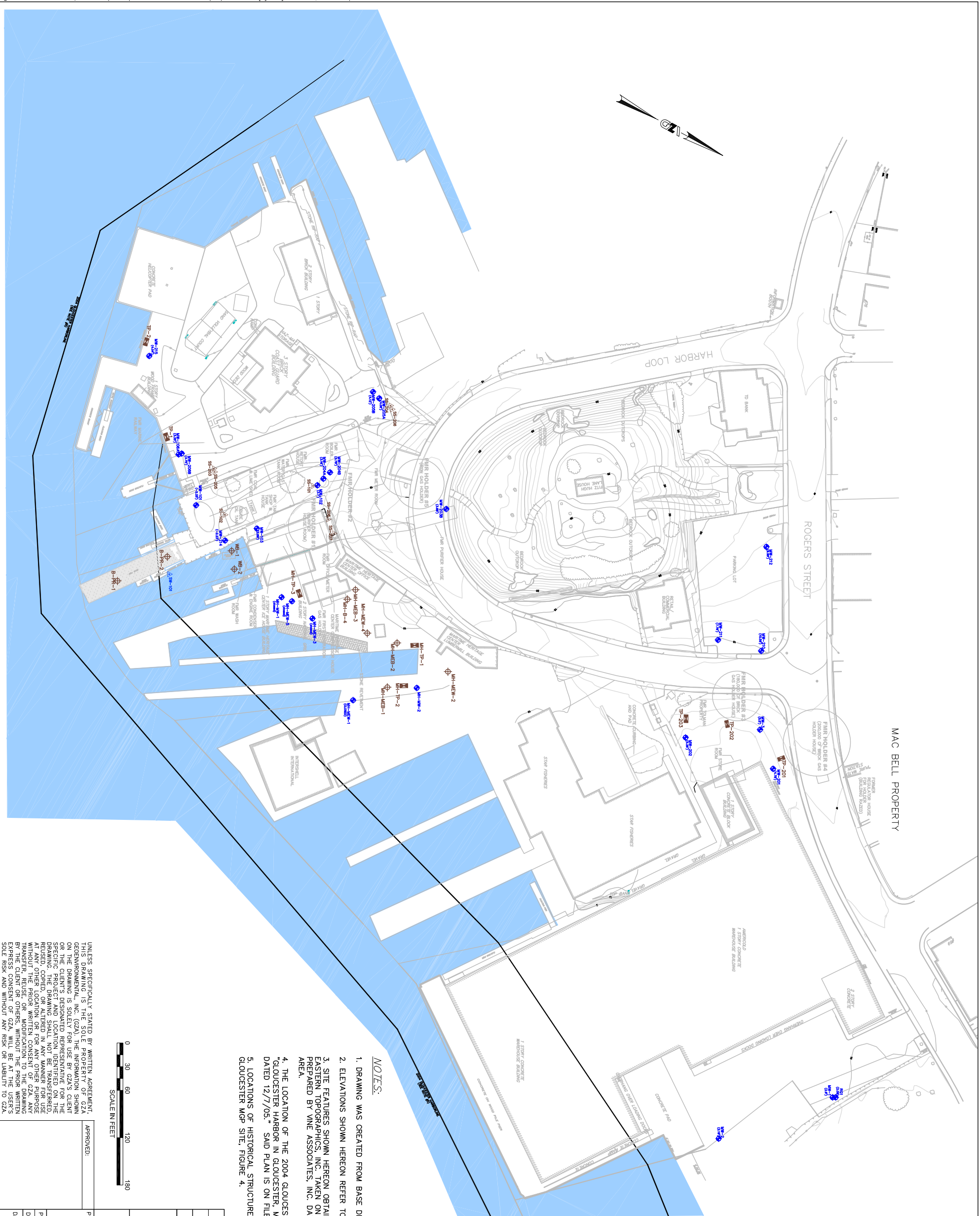
Monitoring Well Location	Installation Date	Installed by	Total Boring Depth	Screened Interval	Formation	Reference Elevation (feet)		Field Measurements (feet)					Groundwater Elevation (ft)	Product Thickness (in)	Notes	
						Road Box	Top of PVC Well Casing	Date	Depth to LNAPL	Depth to Groundwater	Depth to DNAPL	Total well Depth				
MW-102	05/23/06	EECS	15.6	5.8-15.4	Fill/Silt and Sand	12.53	12.1	4/1/09		8.98		14.88	3.12	0	Firm Bottom continuous sound at bottom of well, no odor, coal on tip of porbe	
								10/29/09		8.40		14.90	3.70	0		
								11/21/09		9.28		14.89	2.82	0		
								11/24/09		9.33		14.89	2.77	0		
								12/1/09		6.65		14.89	5.45	0		
								12/16/09		7.25		14.89	4.85	0		
								12/22/09		7.21		14.89	4.89	0		
MW-204A	10/17/08	ARCADIS	44	24-41	Gravel/Boulders	12.86	12.62	4/2/09		9.65		41.00	2.97	0	Soft Bottom	
								10/29/09		9.46		36.29	3.16	0		
								11/21/09		9.87		36.28	2.75	0		
								11/24/09		10.01		36.28	2.61	0		
								12/1/09		9.90		36.32	2.72	0		After removing J-Plug, water level is well was rising. Likely due to tidal fluctuations
								12/16/09		8.60		36.32	4.02	0		
								12/22/09		8.72		36.32	3.90	0		
MW-204B	12/18/08	ARCADIS	60.18	50-60	Bedrock	13.23	12.95	4/1/09		9.35		59.02	3.60	0	non-static	
								4/3/09		21.21		60.00	-8.26	0		
								4/6/09		38.95		60.00	-26.00	0		
								10/29/09		9.16	58.36	58.84	3.79	6		Coal tar on probe when removed, pictures taken of probe end, strong odor, firm bottom
								11/21/2009 0915		9.34	58.40	58.84	3.61	5		DNAPL thickness measured prior to bailing. Subsequently bailed approximately 4 liters of groundwater and product from well to remove accumulated product.
								11/21/2009 1000		15.16		58.84	-2.21	0		After bailing well
								11/21/2009 1400		14.93		58.84	-1.98	0		After bailing well
								11/24/09 0900		13.39	58.75	58.84	-0.44	1		DNAPL thickness measured prior to bailing well. Subsequently bailed approximately 2 liters of groundwater and product from well to remove accumulated product
								11/24/09 0945		13.86		58.84	-0.91	0		After bailing well
								12/1/09 1050		10.23	58.73	58.84	2.72	1		DNAPL thickness measured prior to bailing well. Subsequently bailed approximately 2 liters of groundwater and product from well to remove accumulated product
								12/1/09 1120		12.03	58.84	58.84	0.92	0		After bailing well
								12/16/09 0935		8.77	58.84	58.84	4.18	0		Bailed approximately 1 liter of groundwater from well to confirm lack of recoverable product in well.
								12/16/09 1005		9.02	58.84	58.84	3.93	0		After bailing well
12/22/2009		8.85	58.84	58.84	4.10	0										

Notes:

1. Groundwater elevation was calculated by subtracting Depth to Groundwater from the Elevation of Top of PVC Well Casing.
2. DNAPL thickness was calculated by subtracting Depth to DNAPL from Total Well Depth and was converted to inches.



FIGURE 1
Site Plan



- LEGEND**
- 16 — SURFACE CONTOUR
 - x — CHAIN LINK FENCE
 - wavy line — EDGE OF WOODED AREA/PLANTED AREA
 - A — EDGE PAVEMENT
 - A — SEA WALL
 - ⊕ B-207 ECES SOIL BORING LOCATION
 - ▣ TP-101 ECES TEST PIT LOCATION
 - △ SS-101 ECES SURFACE SOIL SAMPLE LOCATION
 - SS-2 ECES SOIL GAS MONITORING LOCATION
 - ⊕ MW-201 ECES MONITORING WELL LOCATION - PHASE II (GW ELEVATION)
 - ⊕ MW-101 ECES MONITORING WELL LOCATION - PHASE I (GW ELEVATION)
 - △ SW-101 ECES SURFACE WATER SAMPLE LOCATION
 - ⊕ MB-2 CITY OF GLOUCESTER PIER RECONSTRUCTION BORING LOCATION
 - ⊕ MB-1 AMERICOLD MONITORING WELL LOCATION (GW ELEVATION)
 - ⊕ MH-B-4 AMERICOLD MONITORING WELL LOCATION (GW ELEVATION)
 - ⊕ MH-T-1 MARITIME HERITAGE BORING LOCATION
 - ⊕ MH-T-2 MARITIME HERITAGE TEST PIT LOCATION
 - ⊕ MH-MW-201 MARITIME HERITAGE MONITORING WELL LOCATION

NOTES:

1. DRAWING WAS CREATED FROM BASE DRAWING ENTITLED 12702WB4.dwg PROVIDED TO GZA BY NGRID.
2. ELEVATIONS SHOWN HEREON REFER TO THE NATIONAL GEODETIC VERTICAL DATUM OF 1929.
3. SITE FEATURES SHOWN HEREON OBTAINED FROM FIELD SURVEY PERFORMED IN APRIL 2008; AERIAL PHOTOGRAMMETRY BY EASTERN TOPOGRAPHICS, INC. TAKEN ON APRIL 14, 2006; EXISTING FIGURE DRAWING FOR MARITIME HERITAGE CENTER PREPARED BY VINE ASSOCIATES, INC. DATED NOVEMBER 2006; AND PUBLICALLY AVAILABLE AERIAL PHOTOGRAPHY FOR SITE AREA.
4. THE LOCATION OF THE 2004 GLOUCESTER HARBOR LINE SHOWN HEREON WAS OBTAINED FROM A PLAN ENTITLED, "GLOUCESTER HARBOR IN GLOUCESTER, MA (ESSEX COUNTY), 2004 GLOUCESTER HARBORLINE, PREPARED BY BSG GROUP DATED 12/7/05." SAID PLAN IS ON FILE AT THE CITY OF GLOUCESTER ENGINEERING DEPARTMENT.
5. LOCATIONS OF HISTORICAL STRUCTURES TAKEN FROM ECES, AUGUST 2006, PHASE I INITIAL SITE ASSESSMENT, FORMER GLOUCESTER MGP SITE, FIGURE 4.



SITE PLAN

**FORMER GLOUCESTER
GAS LIGHT COMPANY
MGP FACILITY
GLOUCESTER, MASSACHUSETTS**

NO.	ISSUE/DESCRIPTION	BY	DATE

APPROVED:	PREPARED FOR:
<p>GZA GeoEnvironmental, Inc. Engineers and Scientists PORTLAND, MAINE (603) 893-9190</p>	<p>NATIONAL GRID WALTHAM, MA</p>
<p>PROJ MGR: JRP DESIGNED BY: EJB DRAWN BY: EJB/JBT DATE: DECEMBER 2009</p>	<p>REVIEWED BY: JRP CHECKED BY: MJB SCALE: 1" = 120' REVISION NO. PROJECT NO. 09.0025623.00</p>
<p>FIGURE 1</p>	<p>SHEET NO.</p>



APPENDIX A
Release Notification Form



RELEASE NOTIFICATION & NOTIFICATION
RETRACTION FORM

Release Tracking Number

3 - 25126

Pursuant to 310 CMR 40.0335 and 310 CMR 40.0371 (Subpart C)

A. RELEASE OR THREAT OF RELEASE LOCATION:

1. Release Name/Location Aid: @ HARBOR MASTER'S DOCK-FORMER MGP FAC

2. Street Address: 19 HARBOR LOOP

3. City/Town: GLOUCESTER 4. ZIP Code: 01930-0000

5. UTM Coordinates: a. UTM N: 4718929 b. UTM E: 363908

B. THIS FORM IS BEING USED TO: (check one)

- 1. Submit a **Release Notification**
- 2. Submit a **Revised Release Notification**
- 3. Submit a **Retraction of a Previously Reported Notification** of a release or threat of release including supporting documentation required pursuant to 310 CMR 40.0335 (Section C is not required)

(All sections of this transmittal form must be filled out unless otherwise noted above)

C. INFORMATION DESCRIBING THE RELEASE OR THREAT OF RELEASE (TOR):

1. Date and time of Oral Notification, if applicable: 10/30/2009 Time: 12:50 AM PM
mm/dd/yyyy hh:mm

2. Date and time you obtained knowledge of the Release or TOR: 10/29/2009 Time: 02:30 AM PM
mm/dd/yyyy hh:mm

3. Date and time release or TOR occurred, if known: mm/dd/yyyy Time: hh:mm AM PM

Check all Notification Thresholds that apply to the Release or Threat of Release:
(for more information see 310 CMR 40.0310 - 40.0315)

<p>4. 2 HOUR REPORTING CONDITIONS</p> <ul style="list-style-type: none"> <input type="checkbox"/> a. Sudden Release <input type="checkbox"/> b. Threat of Sudden Release <input type="checkbox"/> c. Oil Sheen on Surface Water <input type="checkbox"/> d. Poses Imminent Hazard <input type="checkbox"/> e. Could Pose Imminent Hazard <input type="checkbox"/> f. Release Detected in Private Well <input type="checkbox"/> g. Release to Storm Drain <input type="checkbox"/> h. Sanitary Sewer Release (Imminent Hazard Only) 	<p>5. 72 HOUR REPORTING CONDITIONS</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> a. Subsurface Non-Aqueous Phase Liquid (NAPL) Equal to or Greater than 1/2 Inch <input type="checkbox"/> b. Underground Storage Tank (UST) Release <input type="checkbox"/> c. Threat of UST Release <input type="checkbox"/> d. Release to Groundwater near Water Supply <input type="checkbox"/> e. Release to Groundwater near School or Residence <input type="checkbox"/> f. Substantial Release Migration 	<p>6. 120 DAY REPORTING CONDITIONS</p> <ul style="list-style-type: none"> <input type="checkbox"/> a. Release of Hazardous Material(s) to Soil or Groundwater Exceeding Reportable Concentration(s) <input type="checkbox"/> b. Release of Oil to Soil Exceeding Reportable Concentration(s) and Affecting More than 2 Cubic Yards <input type="checkbox"/> c. Release of Oil to Groundwater Exceeding Reportable Concentration(s) <input type="checkbox"/> d. Subsurface Non-Aqueous Phase Liquid (NAPL) Equal to or Greater than 1/8 Inch and Less than 1/2 Inch
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**RELEASE NOTIFICATION & NOTIFICATION
 RETRACTION FORM**

Release Tracking Number

3 - **25126**

Pursuant to 310 CMR 40.0335 and 310 CMR 40.0371 (Subpart C)

C. INFORMATION DESCRIBING THE RELEASE OR THREAT OF RELEASE (TOR): (cont.)

7. List below the Oils (O) or Hazardous Materials (HM) that exceed their Reportable Concentration (RC) or Reportable Quantity (RQ) by the greatest amount.

O or HM Released	CAS Number, if known	O or HM	Amount or Concentration	Units	RCs Exceeded, if Applicable (RCS-1, RCS-2, RCGW-1, RCGW-2)
COAL TAR		HM	6.00	INCH	N/A

8. Check here if a list of additional Oil and Hazardous Materials subject to reporting is attached.

D. PERSON REQUIRED TO NOTIFY:

1. Check all that apply: a. change in contact name b. change of address c. change in the person notifying

2. Name of Organization: **MASS ELECTRIC CO DBA NATIONAL GRID**

3. Contact First Name: **MICHELE** 4. Last Name: **LEONE**

5. Street: **40 SYLVAN ROAD** 6. Title: **MANAGER SIR GROUP NE**

7. City/Town: **WALTHAM** 8. State: **MA** 9. ZIP Code: **02451-0000**

10. Telephone: **(781) 907-3651** 11. Ext.: 12. FAX:

13. Check here if attaching names and addresses of owners of properties affected by the Release or Threat of Release, other than an owner who is submitting this Release Notification (required).

E. RELATIONSHIP OF PERSON TO RELEASE OR THREAT OF RELEASE:

1. RP or PRP a. Owner b. Operator c. Generator d. Transporter
 e. Other RP or PRP Specify: _____

2. Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)

3. Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))

4. Any Other Person Otherwise Required to Notify Specify Relationship: _____



**RELEASE NOTIFICATION & NOTIFICATION
RETRACTION FORM**

Release Tracking Number

3 - 25126

Pursuant to 310 CMR 40.0335 and 310 CMR 40.0371 (Subpart C)

F. CERTIFICATION OF PERSON REQUIRED TO NOTIFY:

1. I, **MICHELE LEONE**, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

2. By: **MICHELE LEONE**
Signature

3. Title: **MANAGER SIR GROUP NE**

4. For: **MASS ELECTRIC CO DBA NATIONAL GRID**
(Name of person or entity recorded in Section D)

5. Date: **12/29/2009**
mm/dd/yyyy

6. Check here if the address of the person providing certification is different from address recorded in Section D.

7. Street: _____

8. City/Town: _____ 9. State: _____ 10. ZIP Code: _____

11. Telephone: _____ 12. Ext.: _____ 13. FAX: _____

YOU ARE SUBJECT TO AN ANNUAL COMPLIANCE ASSURANCE FEE OF UP TO \$10,000 PER BILLABLE YEAR FOR THIS DISPOSAL SITE. YOU MUST LEGIBLY COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.

Date Stamp (DEP USE ONLY:)

**Received by DEP on
12/29/2009 4:21:22 PM**



APPENDIX B
IRA Plan Transmittal Form



**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

-

A. RELEASE OR THREAT OF RELEASE LOCATION:

1. Release Name/Location Aid:
2. Street Address:
3. City/Town: 4. ZIP Code:
5. UTM Coordinates: a. UTM N: b. UTM E:
6. Check here if a Tier Classification Submittal has been provided to DEP for this disposal site.
 a. Tier IA b. Tier IB c. Tier IC d. Tier II
7. Check here if this location is Adequately Regulated, pursuant to 310 CMR 40.0110-0114. Specify Program (check one):
 a. CERCLA b. HSWA Corrective Action c. Solid Waste Management
 d. RCRA State Program (21C Facilities)

B. THIS FORM IS BEING USED TO: (check all that apply)

1. List Submittal Date of Initial IRA Written Plan (if previously submitted): (mm/dd/yyyy)
2. Submit an **Initial IRA Plan**.
3. Submit a **Modified IRA Plan** of a previously submitted written IRA Plan.
4. Submit an **Imminent Hazard Evaluation**. (check one)
 a. An Imminent Hazard exists in connection with this Release or Threat of Release.
 b. An Imminent Hazard does not exist in connection with this Release or Threat of Release.
 c. It is unknown whether an Imminent Hazard exists in connection with this Release or Threat of Release, and further assessment activities will be undertaken.
 d. It is unknown whether an Imminent Hazard exists in connection with this Release or Threat of Release. However, response actions will address those conditions that could pose an Imminent Hazard.
5. Submit a request to **Terminate an Active Remedial System or Response Action(s) Taken to Address an Imminent Hazard**.
6. Submit an **IRA Status Report**.
7. Submit a **Remedial Monitoring Report**. (This report can only be submitted through eDEP.)
a. Type of Report: (check one) i. Initial Report ii. Interim Report iii. Final Report
b. Frequency of Submittal: (check all that apply)
 i. A Remedial Monitoring Report(s) submitted monthly to address an Imminent Hazard.
 ii. A Remedial Monitoring Report(s) submitted monthly to address a Condition of Substantial Release Migration.
 iii. A Remedial Monitoring Report(s) submitted concurrent with a IRA Status Report.
c. Number of Remedial Systems and/or Monitoring Programs:

A separate BWSC105A, IRA Remedial Monitoring Report, must be filled out for each Remedial System and/or Monitoring Program addressed by this transmittal form.



IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL FORM
Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

-

B. THIS FORM IS BEING USED TO (cont.): (check all that apply)

- 8. Submit an **IRA Completion Statement**.
 - a. Check here if future response actions addressing this Release or Threat of Release notification condition will be conducted as part of the Response Actions planned or ongoing at a Site that has already been Tier Classified under a different Release Tracking Number (RTN). When linking RTNs, rescoring via the NRS is required if there is a reasonable likelihood that the addition of the new RTN(s) would change the classification of the site.

b. Provide Release Tracking Number of Tier Classified Site (Primary RTN): -

These additional response actions must occur according to the deadlines applicable to the Primary RTN. Use the Primary RTN when making all future submittals for the site unless specifically relating to this Immediate Response Action.

- 9. Submit a **Revised IRA Completion Statement**.

(All sections of this transmittal form must be filled out unless otherwise noted above)

C. RELEASE OR THREAT OF RELEASE CONDITIONS THAT WARRANT IRA:

1. Identify Media Impacted and Receptors Affected: (check all that apply)

- a. Air b. Basement c. Critical Exposure Pathway d. Groundwater e. Residence
- f. Paved Surface g. Private Well h. Public Water Supply i. School j. Sediments
- k. Soil l. Storm Drain m. Surface Water n. Unknown o. Wetland p. Zone 2
- q. Others Specify:

2. Identify Oils and Hazardous Materials Released: (check all that apply)

- a. Oils b. Chlorinated Solvents c. Heavy Metals
- d. Others Specify: **COAL TAR**

D. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply, for volumes list cumulative amounts)

- 1. Assessment and/or Monitoring Only
- 2. Temporary Covers or Caps
- 3. Deployment of Absorbent or Containment Materials
- 4. Temporary Water Supplies
- 5. Structure Venting System
- 6. Temporary Evacuation or Relocation of Residents
- 7. Product or NAPL Recovery
- 8. Fencing and Sign Posting
- 9. Groundwater Treatment Systems
- 10. Soil Vapor Extraction
- 11. Bioremediation
- 12. Air Sparging



**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

-

D. DESCRIPTION OF RESPONSE ACTIONS (cont.): (check all that apply, for volumes list cumulative amounts)

13. Excavation of Contaminated Soils

a. Re-use, Recycling or Treatment

i. On Site Estimated volume in cubic yards

ii. Off Site Estimated volume in cubic yards

 ii.a. Receiving Facility: Town: State:

 ii.b. Receiving Facility: Town: State:

 iii. Describe:

b. Store

i. On Site Estimated volume in cubic yards _____

ii. Off Site Estimated volume in cubic yards _____

 ii.a. Receiving Facility: _____ Town: _____ State: _____

 ii.b. Receiving Facility: _____ Town: _____ State: _____

c. Landfill

i. Cover Estimated volume in cubic yards

Receiving Facility: Town: State:

ii. Disposal Estimated volume in cubic yards

Receiving Facility: Town: State:

14. Removal of Drums, Tanks or Containers:

a. Describe Quantity and Amount:

b. Receiving Facility: Town: State:

c. Receiving Facility: Town: State:

15. Removal of Other Contaminated Media:

a. Specify Type and Volume:

b. Receiving Facility: Town: State:

c. Receiving Facility: Town: State:

16. Other Response Actions:

Describe:

17. Use of Innovative Technologies:

Describe:



**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3 - 25126

E. LSP SIGNATURE AND STAMP:

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and 309 CMR 4.03(2), and (iii) the provisions of 309 CMR 4.03(3), to the best of my knowledge, information and belief,

> if Section B of this form indicates that an **Immediate Response Action Plan** is being submitted, the response action(s) that is(are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is(are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that an **Imminent Hazard Evaluation** is being submitted, this Imminent Hazard Evaluation was developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and the assessment activity(ies) undertaken to support this Imminent Hazard Evaluation comply(ies) with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000;

> if Section B of this form indicates that an **Immediate Response Action Status Report** and/or a **Remedial Monitoring Report** is(are) being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that an **Immediate Response Action Completion Statement** or a request to **Terminate an Active Remedial System or Response Action(s) Taken to Address an Imminent Hazard** is being submitted, the response action(s) that is(are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is(are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal.

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

1. LSP #: 1631

2. First Name: MATTHEW J

3. Last Name: BARVENIK

4. Telephone: (781) 278-3700

5. Ext.:

6. FAX:

7. Signature: MATTHEW J BARVENIK

8. Date: 12/29/2009

(mm/dd/yyyy)

9. LSP Stamp:





**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3 - **25126**

F. PERSON UNDERTAKING IRA:

1. Check all that apply: a. change in contact name b. change of address c. change in the person undertaking response actions
2. Name of Organization: **MASS ELECTRIC CO DBA NATIONAL GRID**
3. Contact First Name: **MICHELE** 4. Last Name: **LEONE**
5. Street: **40 SYLVAN ROAD** 6. Title: **MANAGER SIR GROUP NE**
7. City/Town: **WALTHAM** 8. State: **MA** 9. ZIP Code: **02451-0000**
10. Telephone: **(781) 907-3651** 11. Ext.: 12. FAX: **(508) 389-4299**

G. RELATIONSHIP TO RELEASE OR THREAT OF RELEASE OF PERSON UNDERTAKING IRA:

1. RP or PRP a. Owner b. Operator c. Generator d. Transporter
 e. Other RP or PRP Specify:
2. Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)
3. Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))
4. Any Other Person Undertaking IRA Specify Relationship:

H. REQUIRED ATTACHMENT AND SUBMITTALS:

1. Check here if any Remediation Waste, generated as a result of this IRA, will be stored, treated, managed, recycled or reused at the site following submission of the IRA Completion Statement. If this box is checked, you must submit one of the following plans, along with the appropriate transmittal form.
 a. A Release Abatement Measure (RAM) Plan (BWSC106) b. Phase IV Remedy Implementation Plan (BWSC108)
2. Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.
3. Check here to certify that the Chief Municipal Officer and the Local Board of Health were notified of the implementation of an Immediate Response Action taken to control, prevent, abate or eliminate an Imminent Hazard.
4. Check here to certify that the Chief Municipal Officer and the Local Board of Health were notified of the submittal of a Completion Statement for an Immediate Response Action taken to control, prevent, abate or eliminate an Imminent Hazard.
5. Check here if any non-updatable information provided on this form is incorrect, e.g. Release Address/Location Aid. Send corrections to the DEP Regional Office.
6. Check here to certify that the LSP Opinion containing the material facts, data, and other information is attached.



**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

3 - **25126**

I. CERTIFICATION OF PERSON UNDERTAKING IRA:

1. I, **MICHELE LEONE**, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

2. By: **MICHELE LEONE** Signature 3. Title: **MANAGER SIR GROUP NE**

4. For: **MASS ELECTRIC CO DBA NATIONAL GRID** 5. Date: **12/29/2009**
(Name of person or entity recorded in Section F) (mm/dd/yyyy)

6. Check here if the address of the person providing certification is different from address recorded in Section F.

7. Street:
8. City/Town: 9. State: 10. ZIP Code:
11. Telephone: 12. Ext.: 13. FAX:

YOU ARE SUBJECT TO AN ANNUAL COMPLIANCE ASSURANCE FEE OF UP TO \$10,000 PER BILLABLE YEAR FOR THIS DISPOSAL SITE. YOU MUST LEGIBLY COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.

Date Stamp (DEP USE ONLY:)

**Received by DEP on
12/29/2009 6:05:08 PM**