FUSS & O'NEILL
Disciplines to Deliver

February 23, 2011

Ms. Jerry Minor-Gordon
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, MA 02109-3912

RE: Draft - Analysis of Brownfields Cleanup Alternatives
(To be finalized upon completion of public comment period)
Former Nu-Style Property, Lot 27
87 Grove Street
Franklin, Massachusetts
Mass DEP RTN 2-16694

Dear Ms. Minor-Gordon:

Fuss & O'Neill Inc. (Fuss & O'Neill) has conducted an analysis of potential brownfields cleanup alternatives for the environmental remediation planned at the Former Nu-Style Property site, located at 87 Grove Street in Franklin, Massachusetts (the site). Three alternatives related to the dilapidated on-site building and four remedial alternatives for the releases of metals and chlorinated volatile organic compounds (VOC) to soil at the site were evaluated on the basis of protectiveness, implementability, and cost. A summary of the documented environmental conditions, the evaluations of remedial alternatives, and the preferred remedial alternative are described herein. Fuss & O'Neill prepared this analysis on behalf of the Town of Franklin (the Town).

Site History, Environmental Conditions, and Current Status

The subject property is an approximately two-acre parcel located on the western side of Grove Street in a mixed commercial and residential area in Franklin, Massachusetts (Norfolk County). The subject property is comprised of two parcels identified by the Town Tax Assessor as Plat 276, Lots 22 and 27. This document and the remedial alternatives identified herein pertain solely to Lot 27. From hereon, the term Site refers solely to Lot 27. However, the lots were developed concurrently and utilized for similar purposes historically. A site location map and site plan are attached hereto as *Figures 1 and 2*, respectively.

Lot 27 is an approximately one-acre parcel and consists of two distinct sections divided by Mine Brook, which flows generally east-to-west through the site and over a dam adjacent to the subject building. The southern end of the site south of Mine Brook is improved with a parking lot, which is utilized by an abutting property owner with the permission of

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the Town. An approximately 12,000-square foot (sf), two-story former mill building is located on the northern portion of Lot 27, north of Mine Brook.

The mill building was constructed circa 1900 and has been utilized throughout its history for a variety of industrial uses, including textile and paint manufacture, metal plating, and jewelry manufacturing. At least five underground storage tanks (USTs) with a combined capacity of approximately 15,000 gallons were historically utilized at the site for the storage of petroleum products. The last documented industrial usage of the site occurred in 1989, with the closure of the Nu-Style jewelry manufacturing company.

In 1991, four of the USTs, including a 5,000-gallon UST, a 2,000-gallon UST, and a 1,000-gallon UST used to store No. 2 fuel oil, and a 2,000-gallon gasoline UST were removed. In 1991, the ownership of Nu-Style declared bankruptcy, and the property defaulted to the ownership of the Federal Deposit Insurance Corporation (FDIC). In January 1992, the United States Environmental Protection Agency (USEPA) inspected the property and identified drums and containers, including unlabeled containers with unknown contents, abandoned plating equipment and other chemicals and waste materials. Materials identified during the inspection included chlorinated solvents, cyanide sludges, nickel sulfate, and chromic acid. USEPA removed the materials during a Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) removal action.

In 2002 and 2005, the Town acquired Lots 22 and 27, respectively, via tax-title foreclosure. In 2005, the Town Building Commissioner inspected the mill building and determined that it was in poor condition, recommending it be sealed and not entered. The building has been formally condemned due to its structural condition.

In May 2006, Fuss & O'Neill completed a *Phase I Environmental Site Assessment (ESA)* for the subject site, and identified the following Recognized Environmental Conditions (RECs) at the site:

- The site had been operated for approximately 90 years as an industrial operation, for the manufacture of textiles and jewelry. Process chemicals used in these operations included cyanide, metals, chlorinated solvents, and petroleum products.
- At least one UST had not been removed from the property prior to 2006.
- A brick arched pipe, which was potentially a historic mill race or waste disposal conduit, was observed beneath the building on Lot 22.
- A release of chlorinated solvents to soil and groundwater was identified on Lot 26, an abutting property to the south. This property was historically operated by the same owners as the site, and there was the potential for similar releases to have occurred on the site.

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- A mill pond impoundment was filled in approximately 1960 at the southern end of the site. The origin of the fill material was undocumented.

In light of the above conditions, Fuss & O'Neill completed a *Phase II ESA* in September 2007 and more comprehensive environmental and building materials-related assessment activities between 2007 and 2010. To date, Fuss & O'Neill has identified the following environmental conditions at the site:

- A fifth UST, with a storage capacity of 5,000 gallons, was removed from the site in May 2007. Confirmatory soil samples collected from the UST grave were not reported to contain reportable concentrations of petroleum fractions or target compounds.
- Lead was detected in surficial soil (less than two feet below grade [fbg]) and deeper soil (8 to 10 fbg) at the northeastern corner of the building, adjacent to the loading dock. Based on the vertical dispersion of the lead and other metals detected at concentrations less than Massachusetts Department of Environmental Protection (MassDEP) risk-based soil standards and its location adjacent to the loading dock, Fuss & O'Neill inferred that the release mechanism was surficial and may have included spills of chemicals during delivery or removal from the site.
- Chlorinated VOC were detected in surficial and deeper soil on the northwestern corner of the site, adjacent to the site building. Chlorinated VOC were additionally detected in overburden groundwater in this area. The release mechanism for this release is not currently known but may include incidental spills onto surficial soil.
- Chlorinated VOC were detected in the first water-bearing bedrock fracture beneath the building foundation, which was constructed directly on bedrock. The concentrations of VOC in groundwater samples collected directly beneath the building were approximately 100 times greater than in groundwater samples collected from bedrock wells adjacent to the exterior of the building. Based on this condition, Fuss & O'Neill inferred that the release mechanism was a spill from an interior structure, but the exact source of the release has not been identified. This release has not been adequately defined to commence remedial action, as additional bedrock wells are necessary to define the nature and extent of this release. The installation of additional bedrock wells is currently infeasible due to the presence of the site building.
- The site building contains lead painted surfaces, asbestos-containing materials (ACM), and mercury- and polychlorinated biphenyl (PCB)-containing electrical equipment.
- Sediment in Mine Brook downstream of the on-site mill dam and adjacent to Lot 22 contains concentrations of polycyclic aromatic hydrocarbons (PAH) greater than risk-based MassDEP criteria. The concentrations of PAH were generally reported to be higher in samples collected downstream of the "Old Grove Street" bridge

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adjacent to Lot 22 than at upstream locations. The source of PAH is currently unknown. Because the location of PAH in sediment is associated with Lot 22 rather than Lot 27, it is not addressed by the cleanup alternatives presented herein.

Brownfields Cleanup Alternatives

In April 2010, the Town was selected for a $200,000 USEPA Brownfields Cleanup Grant for remedial activities on Lot 27. The Town intends to use the grant money to conduct the remedial activities recommended herein, community involvement activities, and reporting associated with the site.

Two distinct problems are currently associated with the site: 1) the environmental condition of the site and 2) the dilapidated building, which poses a potential risk to public safety. The Lot 27 building is condemned due to its structural condition and presents a risk to public safety. Soil at the site has been adequately characterized to consider the remedial alternatives described below. Therefore, the cleanup alternatives discussed herein pertain only to the building condition and soil remediation on Lot 27. These two conditions are evaluated separately below, and the final recommendation incorporates both of these elements into an overall cleanup strategy. The following sections discuss the individual alternatives and the potential costs and benefits associated with potential strategy.

Previous assessments have documented the detection of chlorinated VOC in groundwater in the bedrock aquifer. The presence of the on-site building is preventing assessment of groundwater quality in the bedrock aquifer. Further investigation of the bedrock aquifer is required to complete a Phase II Comprehensive Site Assessment (CSA) in accordance with the Massachusetts Contingency Plan (MCP) and develop a remediation strategy for the groundwater condition. An analysis of potential groundwater remedial alternatives is not included herein due to the necessity of eliminating the building prior to the performance of further assessment of the release to groundwater.

Building Condition Alternative #1: No Action

The existing structure is currently condemned due to its structural condition and poses a potential risk to public safety. Due to impacts associated with weather and the current state of disrepair of the building, this condition will not improve and is anticipated to worsen over time. Therefore, if no corrective action is taken, the site will continue to pose a risk to public safety, and, therefore, this alternative is not protective of human health and safety. Structural collapse would potentially impact Mine Brook wetlands, and thus, this alternative would also not be protective of the environment.

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Building Condition Alternative #2: Renovation

Renovation of the existing structure would be a potential method to improve its structural integrity and mitigate the risk to public safety posed by the site.

Protectiveness

By restoring the building to a usable state, immediate risks to public safety would be minimized, and the site could potentially be returned to active use. During renovation activities, workers may be exposed to hazardous building materials (including lead paint, asbestos, and mercury- and PCB-containing building materials) as documented previously by Fuss & O'Neill EnviroScience, LLC (EnviroScience) in a March 2009 *Hazardous Building Materials Inspection*. However, personnel conducting these activities would be required to have appropriate training and personnel protective equipment to mitigate significant risks to their health during renovation activities. Ideally, these materials would be removed from the building prior to renovation activities, and thus, later-stage construction workers and future site users would not be exposed to these materials. Due to the condemnation of the building and lack of structural integrity, it may not be feasible to implement a building materials abatement program.

Fuss & O'Neill's data indicates that a source of VOC exists in bedrock below the on-site building and may pose a risk of vapor intrusion into the building. Therefore, the building would be required to be retrofitted with a vapor mitigation system in order to mitigate vapor intrusion risks to future building users. Furthermore, this VOC source has not been adequately characterized, and rehabilitation of the existing structure could complicate future investigation and remediation of this release.

Implementability

The building has been condemned by the Town Building Commissioner, and, therefore, building rehabilitation is assumed to be infeasible for both legal and technical reasons. Portions of the building are collapsed and water damaged, and as such, rehabilitation would likely require complete reconstruction of the building.

Cost

The cost of building rehabilitation, if this alternative were permitted by the Town, would significantly exceed the $240,000 currently budgeted by the Town for this project. The cost of rehabilitation may be significantly greater than this amount, due to the anticipated technical challenges of rehabilitating a building in such poor structural condition. Therefore, this method may not be cost-effective for the Town to implement.

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Building Condition Alternative #3: Demolition and Off-Site Disposal of Building Materials

Building demolition and off-site disposal of building materials would remove the risk posed by the structurally unsound building by dismantling the building in a controlled manner.

Protectiveness

Removal of the building would mitigate the risk posed to public safety by removing the source of the risk (the dilapidated building). During demolition activities, workers may be exposed to hazardous building materials on a short-term, high-intensity basis, as documented above. However, personnel conducting these activities would be required to have appropriate training and personnel protective equipment to mitigate significant risks to their health during demolition activities. Following the completion of abatement and demolition activities, the building will not pose a continued risk to site users.

Removal of the building would additionally facilitate other remediation efforts by making bedrock beneath the building footprint accessible for future investigation. Additionally, demolition of the building foundation would facilitate access to contaminated soil to support additional remediation activities. Therefore, removal of the building would facilitate additional response actions which would be used to mitigate risks to human health and the environment at the site.

Implementability

Implementation of building demolition is technically feasible. Based on the current condition of the building, demolition would occur, and the resulting waste materials would be segregated for disposal as regulated asbestos waste, or other waste category based on the results of characterization of the constituent materials. Interior abatement work is not considered feasible due to the structural condition of the building. To implement this approach it will be necessary for the Town to apply for and receive a waiver from MassDEP to allow demolition prior to abatement.

The building material data compiled by EnviroScience in the March 2009 *Hazardous Building Materials Inspection* is generally sufficient to solicit bids for building demolition, and the bid documents can specifically solicit qualifications relative to controlled demolition and segregation of building materials proximal to wetland areas, hazardous materials abatement, and other project-specific requirements, in order to ensure that the selected contractor is capable of implementing a project of this magnitude.

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Cost

The Town is prepared to conduct the building demolition with funds available in the $200,000 USEPA Brownfields Cleanup Grant as well as the Town's matching funds and other funding sources. Of all the alternatives presented herein, demolition and off-site disposal of regulated and hazardous materials is the most cost effective.

Summary of Building Condition Cleanup Alternatives

The following table is a summary of potential cleanup alternatives evaluated for the building, as discussed herein:

Cleanup Alternative	Protectiveness of Human Health and Environment	Implementability	Cost
1. No Action	Not adequate	Technically feasible	No immediate costs, long term costs due to risk to public safety
2. Building Rehabilitation	Adequate with appropriate modifications	Not technically or legally feasible	Financially infeasible under USEPA Brownfields Cleanup Grant
3. Building Demolition	Adequate	Technically feasible	Most cost effective, expected to be completed with USEPA Brownfields Cleanup Grant and Town matching funds

Overall, Fuss & O'Neill considers building demolition to be the most feasible and protective alternative with regard to the on-site building.

Soil Contamination Alternative #1: No Action

A regulated release of hazardous materials to soil was documented at the site. Soil concentrations of the contaminants of concern (COC) at the site exceed applicable MassDEP risk-based criteria and must be managed accordingly. Additionally, groundwater at the site contains several of the COC, including chlorinated VOC, at concentrations greater than MassDEP risk-based criteria which could apply to the site in a re-use of the property. Fuss & O'Neill's conceptual site model identified three releases of the COC, including two releases of chlorinated VOC, to soil at the site, and identified leaching COC as the source of lead and chlorinated VOC in overburden groundwater at portions of the site. Therefore, inaction will allow these conditions to persist, and may contribute to the migration of COC in the subsurface over time. The chlorinated VOC present a potential risk to indoor air quality if the property is redeveloped, and, therefore, limit the potential for site redevelopment without remedial action. Therefore, remedial action is warranted to remove these contaminants in order to directly address the release to soil and to minimize

the ongoing risk to groundwater at the site. This cleanup alternative would not be an effective remedial alternative to achieve a permanent solution and a Condition of No Significant Risk at the site as required by MassDEP regulations.

Soil Contamination Alternative #2: Monitored Natural Attenuation (MNA)

MNA can be a viable remedial alternative at many regulated sites. However, the utilization of MNA at this site as a remedial alternative alone would not be feasible because soil concentrations of the COC at the site exceed applicable MassDEP risk-based criteria and must be managed accordingly. Furthermore, the COC at the site include metals and chlorinated VOC, which persist in the environment and do not readily attenuate under most conditions over a period of decades. Overall, MNA would not be an effective remedial alternative to achieve a permanent solution and a Condition of No Significant Risk at the site.

Soil Contamination Alternative #3: Excavation and Off-Site Disposal of Soil Containing VOC and Lead

Excavation and off-site disposal of soil containing hazardous materials may be an effective way of reducing risks posed by hazardous materials at the site by physically removing the source material.

Protectiveness

By removing the soil from the site, long-term risks to human health and the environment at the site would be mitigated. During excavation and transportation of soil, there may be short-term high-intensity direct exposure risks to human health and the environment at the site, including the adjacent Mine Brook, as well as at the final destination of the excavated materials. However, personnel conducting these activities would be required to have appropriate training and personnel protective equipment to mitigate significant risks to their health during remediation activities. The off-site disposal location would be a licensed receiving facility designed to mitigate off-site migration of hazardous material. Therefore, this alternative would result in the secure long-term disposal of the material, mitigating future risks to both on-site and off-site receptors.

Implementability

Implementation of excavation and off-site disposal of soil as a remedial alternative is technically feasible. Both of the generalized soil releases (VOC west and northwest of the building and metals east of the loading dock on the northeastern corner of the building) were documented to extend downward from the ground surface to the water table

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elevation, less than ten feet below grade. Therefore, regulated soil would be accessible for heavy equipment.

The equipment required to excavate regulated soil and manage it for off-site disposal would be similar to the equipment required for building demolition, and, thus, this activity could be conducted concurrently with or upon completion of the demolition project. This approach would provide an economy of scale to the project, as the contractor could complete the work in a single mobilization.

Implementation of excavation and off-site disposal of soil containing hazardous materials as a remedial alternative would comply with the MCP as well as other state and local laws. Any modifications to grade at the site will have to be managed in accordance with municipal by-laws and Orders of Conditions issued by the Conservation Commission.

Cost

The costs of excavation, transportation, and disposal of limited volumes of material would likely not be excessive. Available data indicate that the volumes of soil containing regulated levels of lead and chlorinated VOC are confined to two limited areas of overburden soil, and the concentrations of hazardous materials in these areas could be acceptable for disposal at a lined landfill in Massachusetts, limiting costs associated with soil disposal. As discussed above, soil excavation could be conducted concurrently with or upon completion of the demolition project, providing an economy of scale to the project.

This remedial alternative could be completed by the Town with the funds available in the $200,000 USEPA Brownfields Cleanup Grant. Therefore, excavation and off-site disposal is considered financially feasible.

Soil Contamination Alternative #4: Capping in Conjunction with an Activity and Use Limitation (AUL)

A fourth potential remedial alternative consists of capping the site with clean fill or an engineered barrier to mitigate direct exposure to soil containing hazardous materials at concentrations greater than the applicable soil standards. The cap would consist of either one foot of clean fill overlying a geotextile fabric, two feet of clean fill, building foundation, and/or pavement. An AUL, a type of permanent deed restriction, would also be implemented. The AUL would restrict future usage of the site in order to ensure the integrity of the soil cap and would include inspection, maintenance, and reporting requirements.

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Protectiveness

This remedial alternative would involve capping the site for the purpose of reducing the potential for site users to be exposed to soil containing hazardous materials. An AUL would restrict future site usage in order to maintain the cap, thereby limiting the exposure to soil containing hazardous materials on the site. Therefore, this alternative would result in the reduction of exposure to soil containing hazardous materials, mitigating future risks to site users.

Implementability

Capping of surficial material as a remedial alternative is technically feasible. The work would involve the importation of fill material and require access to the site by earthwork equipment. The Town would be technically capable of executing a construction project of this nature. Any modifications to grade at the site will have to be managed in accordance with municipal by-laws and Orders of Conditions issued by the Conservation Commission.

Implementation of a cap in conjunction with the filing of an AUL may comply with the MCP as well as other state and local laws. However, this approach may not be consistent with the response action performance standard (RAPS) if a permanent solution may be feasible without an AUL. Furthermore, under the requirements of the MCP, capping and an AUL may only be conducted at the conclusion of a *Phase III Identification, Evaluation and Selection of Comprehensive Remedial Action Alternatives* (Phase III) report. The MCP phases are conducted sequentially, and to date, the Phase II Comprehensive Site Assessment (Phase II) has not been completed due to complications related to access limitations for the exploration of bedrock beneath the building. Therefore, further investigation would be required in order to complete the required assessments in order to select a site-wide cap as an appropriate remedial alternative.

Cost

In Fuss & O'Neill's experience, the actual cost of cap construction may vary, but the general costs are in the range of $100,000 to $150,000 per acre, and, thus, would be financially feasible for the Town under the existing USEPA Brownfields Cleanup Grant funding. However, as stated above, a number of additional investigations and feasibility studies would be required in order to select a cap as an appropriate remedial alternative. These investigations, and, in particular, the installation of bedrock wells, may carry significant expenses for the Town and could not be conducted until the completion of the building demolition. This approach would require two separate mobilizations of heavy equipment to the site (one mobilization for building demolition and bedrock exploration, and a later mobilization for cap construction), which would increase project costs without adding an associated value to the site. Additional investigation requirements would fall outside of the acceptable uses of USEPA funds and would not be available for reimbursement under the existing Brownfields Cleanup Grant.

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The design of a potential cap or engineered barrier would be dependent upon the future use of the site. To date that future site owner / operator has not been identified. One of the primary objectives of the Town is to clean up the site to facilitate the sale and reuse of the land for the highest value and best purpose. Without knowing that end purpose, it is not feasible to design a permanent cap.

Therefore, the construction of a cap and implementation of an AUL would carry a significant cost beyond the cost of site remediation activities. In the absence of ancillary costs, capping and the implementation of an AUL may be less expensive than other remedial alternatives. However, the overall cost required to construct a cap may be financially infeasible for the Town.

Additionally, the AUL could limit redevelopment opportunities for the Town and potentially detract from the resale value of the property. Due to the significant procedural costs, anticipated maintenance requirements, and potential loss of property value for the Town, capping and an AUL are considered financially infeasible.

Summary of Soil Contamination Cleanup Alternatives

The following table is a summary of potential cleanup alternatives evaluated for the surficial soil releases identified at the site, as discussed herein:

Cleanup Alternative	Protectiveness of Human Health and Environment	Implementability	Cost
1. No Action	Not adequate	Technically feasible	No associated costs
2. Monitored Natural Attenuation	Not adequate	Technically feasible	Relative low cost but long-term monitoring required
3. Excavation and Off-Site Disposal	Adequate	Technically feasible	Could be completed with USEPA Brownfields Cleanup Grant
4. Capping in Conjunction With An AUL	Adequate	Technically feasible; Potentially legally infeasible due to MCP requirements	Significant procedural costs for completion and long-term maintenance; additional funds would be required.

Preferred Cleanup Alternative

Based on the evaluation of cleanup alternatives documented above, Fuss & O'Neill considers Building Condition **Alternative #3: Building Demolition** and **Soil Contamination Alternative #3: Excavation and Off-Site Disposal of Soil Containing Hazardous Materials** the most feasible, protective, and cost-effective strategy for

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reducing risks posed by hazardous materials. These strategies will collectively reduce risks to human health and the environment by removing the materials which pose these risks and facilitate redevelopment of the property. Furthermore, these remedial alternatives can be largely completed by the Town with the existing available funding from the USEPA Brownfields Cleanup Grant.

A 30-day public comment period will be advertised that will announce the availability of this analysis, and this analysis will be presented by the Town in a public meeting scheduled for April 6, 2011. The *Analysis of Brownfields Cleanup Alternatives* will be finalized upon completion of the 30-day public comment period and after public comments are addressed. Please feel free to contact us if you have any questions or if you require additional information.

Sincerely,

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Daniel C. LaFrance
Project Engineer

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David JP Foss, CPG, LSP
Senior Project Manager

C: Mr. Bryan Taberner, Town of Franklin

Attachments: Figure 1: Site Location Map
Figure 2: Site Plan

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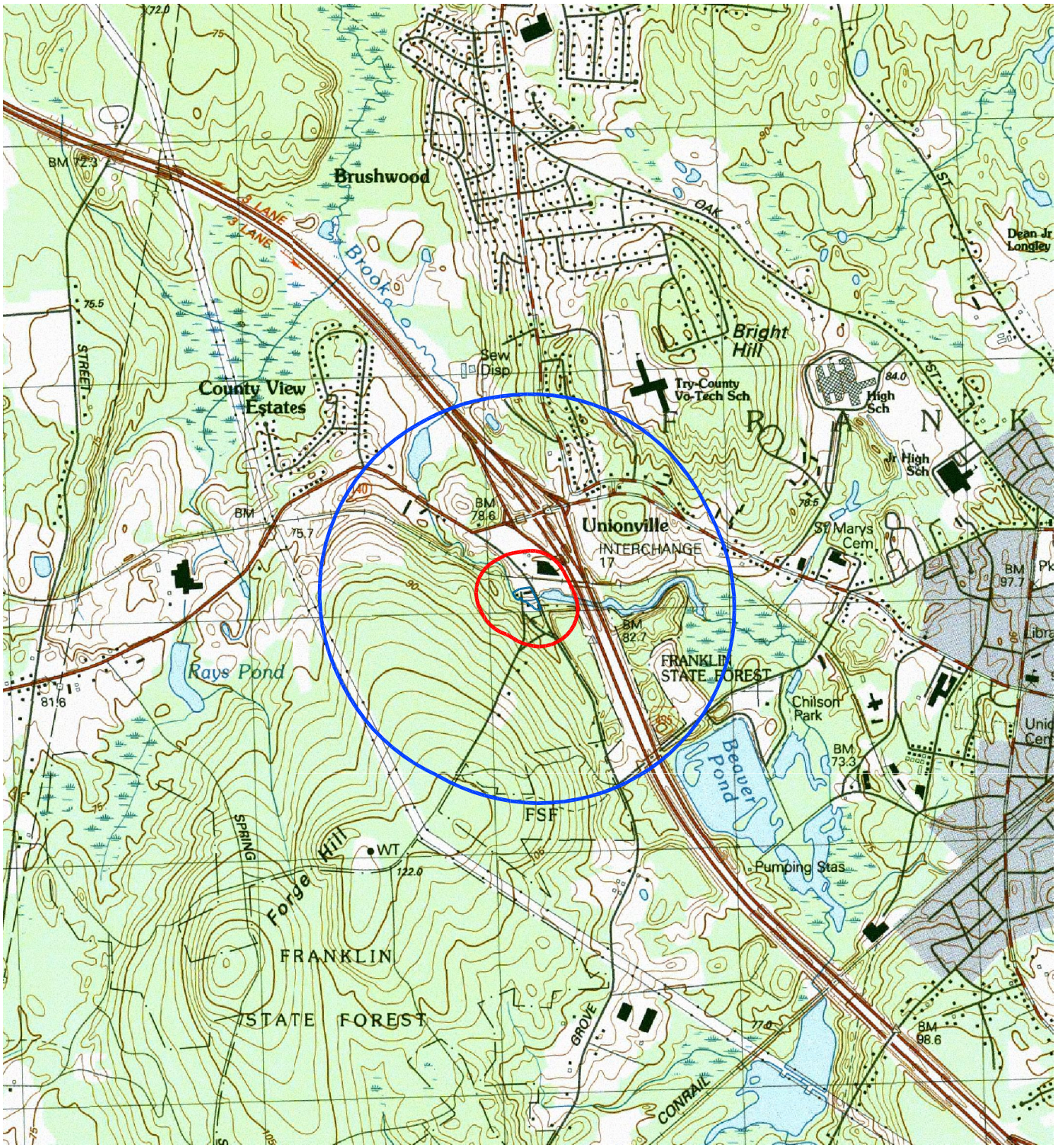

MAP REFERENCE

THIS MAP WAS PREPARED FROM USGS TOPOGRAPHIC QUADRANGLE IMAGES, FRANKLIN, MASSACHUSETTS
© 1995 MASSGIS. ORIGINAL MAP PUBLICATION DATE: 1987

SOURCE: OFFICE OF GEOGRAPHIC AND ENVIRONMENTAL INFORMATION (MASSGIS), COMMONWEALTH OF MASSACHUSETTS EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS

LEGEND

500 FOOT RADIUS

1/2 MILE RADIUS

APPROXIMATE SUBJECT PROPERTY BOUNDARY

SCALE:	
HORZ.: 1" = 2000'	
VERT.:	
DATUM:	
HORZ.:	
VERT.:	
0 1000 2000	
GRAPHIC SCALE	

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TOWN OF FRANKLIN

SITE LOCATION MAP

FORMER NU-STYLE FACILITY

87 GROVE STREET FRANKLIN, MASSACHUSETTS

PROJ. No.: 20050458.F30
DATE: FEBRUARY 2011

FIGURE 1

File Path: J:\DWG\P2005\0458\F30\Environmental\Plan\20050458F30_LOC01.dwg, Layout: 08.5x11-P_R/71-SM-COLOR, Plotted: Tue, Feb 08, 2011 - 4:54 PM User: dlafrance
Plotter: ACROPLOT.PC3 CTB File: FO 2008 COLOR (HALF).CTB
MS VIEW:
LAYER STATE:

25' WETLAND PERIMETER
50' WETLAND PERIMTER
100' WETLAND PERIMTER
200' RIVERFRONT BUFFER
LOT 28
PROPOSED AREA OF SOIL REMOVAL
B-10
MW-5/ B-9
B-11
MW-16/ B-16
MW-14/ B-14
B-15
ROW
B-6
GROVE STREET
COLLAPSED ROOM
LOT 27
BUILDING
LOT 22
BUILDING
LOT 20
MW-3/ B-7
ROW
ROW
B-5
PROPOSED AREA OF SOIL REMOVAL
MW-13/ B-13
ROW
B-4
MW-19
B-12
MW-18
MW-2/B-3
MW-4/B-8 (FORMER)
LOT 21
FLOW
B-2
MINE BROOK
LOT 20
MW-1/B-1
MILL DAM
PARKING AREA
MW-17/B-17
LOT 19
OLD FORGE HILL ROAD
LOT 26

LEGEND

- PROPERTY BOUNDARY
- PARCEL LINES
- ROW — TOWN-OWNED RIGHT OF WAY
- TOWN-OWNED ROADWAY
- RAIL LINE
- EDGE OF WATER
- WETLANDS
- RTN 2-16594 DISPOSAL SITE BOUNDARY (DASHED WHERE APPROXIMATE)
- APPROXIMATE AREA OF PROPOSED SOIL REMOVAL
- OVERBURDEN MONITORING WELL (GRAYED WHERE DESTORYED)
- SHALLOW BEDROCK MONITORING WELL
- SOIL BORING
- HYDRANT

REFERENCE:

BASEMAP FEATURES WERE OBTAINED FROM THE FOLLOWING SOURCES:

1) TOWN OF FRANKLIN ASSESSOR'S MAP 276 AND GIS MAPPING
2) SITE OBSERVATIONS BY FUSS & O'NEILL
3) 2010 AERIAL PHOTOGRAPHY FROM GOOGLE
4) JULY 2003 "SITE PLAN MODIFICATION, ASSESSOR'S MAP 72, LOT 7" BY UNITED CONSULTANTS, INC.

NOTES:

THE USEPA BROWNFIELDS REMEDIATION GRANT APPLIES SOLEY TO LOT 27. NO ACTION IS PLANNED OUTSIDE OF DISPOSAL SITE BOUNDARY OR ON THE LOT 22 PORTION OF THE DISPOSAL SITE.

ADDITIONAL RESPONSE ACTIONS WILL BE WARRANTED ON LOT 22 AT A LATER DATE.

SCALE:
HORZ.: 1" = 40'
VERT.:
DATUM:
HORZ.:
VERT.:
0 40 20
GRAPHIC SCALE

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TOWN OF FRANKLIN

DISPOSAL SITE PLAN

FORMER NU-STYLE PROPERTY

87 GROVE STREET FRANKLIN, MASSACHUSETTS

PROJ. No.: 20050458.F30
DATE: FEBRUARY 2011

FIGURE 2

File Path: J:\DWG\P2005\0458\F30\Environmental\Plan\20050458F30_STP01.dwg, Layout: 11x17-P_RI71-SM-COLOR, Plotted: Thu, Feb 10, 2011 - 4:54 PM User: diafrance
Plotter: ACROPLOT.PC3 CTB File: FO 2008 COLOR (HALF).CTB
MS VIEW: LAYER STATE: