

# Blackstone Environmental Solutions, LLC

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Environmental Consulting and Licensed Site Professional Services

Erik Johnson  
Bureau of Waste Site Cleanup  
MassDEP Northeast Regional Office  
150 Presidential Way  
Woburn, MA 01801

October 6, 2023  
Project #1843

**RE: Immediate Response Action Plan**

Vacant Parcels  
12 Cedar Road, 14 Cedar Road, and 14 Barnes Road  
Salem, MA 01970  
RTN 3-38273

Dear Mr. Johnson:

On behalf of JL Realty Trust, JMI Realty Trust, and Barnes Road Trust, Blackstone Environmental Solutions LLC is submitting the following Immediate Response Action (IRA) Plan for the vacant parcels of land located at 12 Cedar Road, 14 Cedar Road, and 14 Barnes Road in Salem, Massachusetts. The purpose of these IRA activities is to prevent, control, abate, or eliminate an Imminent Hazard (IH) as required in 310 CMR 40.0322 and 40.0426. The following submittal has been prepared pursuant to 310 CMR 40.0424 of the Massachusetts Contingency Plan (MCP).

As you are aware, timely Response Actions have been completed at the Site since the release was first discovered, and these activities have been coordinated and regularly communicated to the Massachusetts Department of Environmental Protection (MassDEP). All efforts to date have been devoted to assessing the impacts of the release at the Site through the performance of the critical and timely assessment and research efforts described herein. Unfortunately, due to the anticipating timing of the receipt of laboratory analytical results from the September 27, 2023 surficial soil assessment program, no conclusion in this report has been made as to whether an Imminent Hazard exists at the Site. BES will begin the compilation of the data collected which will be provided to the MassDEP along with Method 3 Risk Characterization equations and factors used to make a conclusion as to whether an Imminent Hazard exists at the Site during the week of October 16, 2023.

It should also be noted that a second phase of surficial soil testing is proposed in areas that are inaccessible except through the Cedar Road Easement. The Cedar Road Easement is not accessible at this time due to the fact that it is partially located within the Berman Properties LLC redevelopment project at Highland Avenue and Cedar Road, and is an asbestos cleanup site. BES prepared a Standard Operating Procedure (SOP) memorandum for equipment decontamination for access to the Cedar Road Easement via a commercial truck and is currently awaiting MassDEP approval before proceeding with this second phase of surficial soil testing.

Blackstone Environmental Solutions, LLC  
76 Bay View Drive Shrewsbury MA 01545  
(508) 612-4738 · www.bes-env.com

Massachusetts Department of Environmental Protection (MassDEP) Bureau of Waste Site Cleanup (BWSC) Form 105 has been filed via eDEP for RTN 3-38273. If you have any questions regarding this project, please feel free to contact the undersigned.

If there are any questions regarding this correspondence, please do not hesitate to contact the undersigned.

Sincerely,  
**Blackstone Environmental Solutions, LLC**

A handwritten signature in black ink, appearing to read "Michael C. Bricher". The signature is fluid and cursive, with the first name "Michael" and last name "Bricher" clearly distinguishable.

Michael C. Bricher, LSP, P.G.  
Principal

CC: Kathleen Ingemi, 381 Highland Avenue, Salem, MA 01970  
Jamy Buchanan Madeja, Esq., Buchanan & Associates, 100 Cambridge Street, Suite  
1400, Boston, MA 02114

# **Blackstone Environmental Solutions, LLC**

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**Environmental Consulting and Licensed Site Professional Services**

## **IMMEDIATE RESPONSE ACTION (IRA) PLAN**

**Vacant Parcels  
12 Cedar Road, 14 Cedar Road, and 14 Barnes Road  
Salem, MA 01970**

**MassDEP RTN 3-38273**

**October 6, 2023**

**Prepared for:**

**JL Realty Trust, JMI Realty Trust, and Barnes Road Trust  
381 Highland Avenue  
Salem, MA 01970**

**Prepared by:**

**Blackstone Environmental Solutions, LLC  
76 Bay View Drive  
Shrewsbury, Massachusetts 01545**

**BES # 1843**

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- Figure 3: Aerial Map
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### **APPENDICES**

- Appendix A: MassDEP Notice of Responsibility
- Appendix B: Imminent Hazard Initial Site Assessment Summary Table and Proposed Surficial Soil Sampling Location Plan
- Appendix C: BES Memorandum: Standard Operating Procedures for Equipment Decontamination through the Cedar Road Easement, Salem, MA-October 3, 2023
- Appendix D: Immediate Response Action Public Notices

## 1.0 INTRODUCTION

On behalf of JL Realty Trust, JMI Realty Trust, and Barnes Road Trust (property owners), Blackstone Environmental Solutions LLC (BES) has prepared the following Immediate Response Action (IRA) Plan for the reportable condition found to be present at the above-referenced Site. The disposal Site (the “Site”), is currently defined as portions of the properties located at 14 Barnes Road, 9 Cedar Road, 12 Cedar Road, 14 Cedar Road, 15 Cedar Road, and 16 Cedar Road. An imminent hazard condition was determined to have existed on 12 Cedar Road, 14 Cedar Road, and 14 Barnes Road, as a result of polychlorinated biphenyl (PCB) and total chromium impact in the top 6 inches of soil. The release condition was assigned Release Tracker Number (RTN) 3-38273 by the Massachusetts Department of Environmental Protection (MassDEP). A Site Locus, Site Plan, Aerial Map MassDEP Phase I Site Assessment Map are included as Figures 1, 2, 3, and 4, respectively.

This IRA Plan and Bureau of Waste Site Cleanup (BWSC) Form 105 are submitted electronically via the Massachusetts Department of Environmental Protection’s (MassDEP) eDEP online filing system. Response actions covered by this report are through September 30, 2023. Additional data obtained after October 3, 2023 will be included in the IRA Status Report due to MassDEP by December 5, 2023.

It is noted that the following reports and/or forms were previously provided to MassDEP for Site RTN 3-38273:

- Imminent Hazard Evaluation Plan- September 15, 2023; and
- Release Notification Form (RNF), BWSC-103 – Concurrent with this IRA Plan

As each of these submittals may contain pertinent information not necessarily reiterated in this document, each should be reviewed for content and are herein included in this report by reference.

## **2.0 DESCRIPTION OF RELEASE CONDITIONS ASSOCIATED WITH RTN 3-38273**

On August 7, 2023, the MassDEP was notified on behalf of JL Realty Trust of the detection of total chromium in a sample that was collected in the top 6 inches of soil material at the vacant property located at 14 Cedar Road, and exhibited a concentration above the notification threshold for the purpose of fulfilling the “Two Hour” release notification obligations of 310 CMR 30.0311(7), as a “Could Pose” Imminent Hazard to human health. The dataset generated as part of an assessment by Chubb Global Risk Advisors on January 31, 2020 includes a total chromium concentration of 258 milligrams per kilogram (mg/kg) that was collected in the top 6 inches of material at location SS-2. SS-2 is located in close proximity to the property boundary for 16 Cedar Road. MassDEP subsequently assigned RTN 3-38273 to this 2-hour reporting condition.

On August 11, 2023, the MassDEP was notified on behalf of Barnes Road Trust that the vacant property located at 14 Barnes Road has triggered a 2-hour reporting condition (i.e., potential Imminent Hazard Condition). The 14 Barnes Road property is located immediately adjacent to 14 Cedar Road. The dataset generated as part of an assessment by Weston & Sampson on October 9, 2020 includes a total polychlorinated biphenyl (PCB) concentration of 118.3 mg/kg that was collected in the top 6 inches of material at location N-9. This PCB concentration is above the notification threshold for the purpose of fulfilling the “Two Hour” release notification obligations of 310 CMR 30.0311(7), as a “Could Pose” Imminent Hazard to human health notification threshold.

On August 14, 2023, the MassDEP was notified on behalf of JL Realty Trust that the vacant property located at 12 Cedar Road has triggered a 2-hour reporting condition (i.e., potential Imminent Hazard Condition). The dataset generated as part of that assessment by Weston & Sampson on October 8, 2020 includes a total PCB concentration of 66 mg/kg that was collected in the top 6 inches of material at location F-3. This PCB concentration is above the notification threshold for the purpose of fulfilling the “Two Hour” release notification obligations of 310 CMR 30.0311(7), as a “Could Pose” Imminent Hazard to human health notification threshold. The 12 Cedar Road property is immediately adjacent to 14 Cedar Road.

MassDEP verbally approved environmental response actions to be conducted under RTN 3-38273 for 12 Cedar Road, 14 Cedar Road, and 14 Barnes Road, and includes but not limited to an expedited subsurface investigation program to address the potential Imminent Hazard condition to human health at the Site. The assessment activities will be performed to further investigate the source of the shallow heavy metals, including chromium and lead, and PCB impacted soils. Also, MassDEP has approved the installation of a security fence along the southern boundary of 16 Barnes Road in order to restrict access to 14 Barnes Road via a trespasser scenario.

### **3.0 PARTY CONDUCTING IRA**

The party assuming responsibility for conducting this IRA is listed below:

JL Realty Trust, JMI Realty Trust, and Barnes Road Trust  
381 Highland Avenue  
Salem, Massachusetts 01970  
Site Contact: Kathleen Ingemi, Trustee  
(978) 744-3600

The above referenced Trusts were established between 1980 and 1995 with Kathleen Ingemi and her brother, Stephen Ingemi serving as Trustees.

The name and address of the Licensed Site Professional of record for this Disposal Site is provided below.

Licensed Site Professional (LSP):  
Mr. Michael Bricher, LSP, P.G., LSP No. 3926  
Blackstone Environmental Solutions LLC  
76 Bay View Drive  
Shrewsbury, MA 01545  
(508) 612-4738

### **4.0 SITE CONDITIONS AND SURROUNDING RECEPTORS**

The subject parcels consist of approximately 15 acres of undeveloped land along Highland Avenue, Barnes Road, and Cedar Road. Property access is restricted from Highland Street and Cedar Road with a security fence installed by the abutting property owner, Berman Properties LLC to the west. The rear of the Site is surrounded by dense wooded vegetation and wetlands. Dense woodlands exist at the southern boundary along Barnes Road. No evidence of any recent land disturbance was observed during Site visits performed by BES in August and September 2023.

The topography varies greatly across the Site. The lowest topography area is located on the southeastern portion of the Site.

Utilities servicing the surrounding properties include municipal water, sewer, overhead telephone and electrical lines and natural gas. Surrounding properties to the north, west, and south are utilized for commercial and residential purposes. Undeveloped woodlands exist to the east of the Site.

A large warehouse redevelopment project is currently under construction at 355 Highland Avenue (i.e., the “Berman Property”). Residences abut the Site to the southwest and south.

According to the MassDEP Phase I Site Assessment Map, Figure 4, the only sensitive environmental receptor located on Site is wetlands, located on the northeastern and southeastern portions of the Site. A mapped surface water body abuts the Site to the east and appears to discharge into the Forest River. The Forest River is located approximately 900 feet to the east of the Site. Mapped wetlands are also located approximately 900 feet to the south and 1,200 feet northwest of the Site. The locations of local surface water expression are based on geographical information obtained from the Salem and Lynn MA USGS Quadrangle Topographic Maps and observations at the Site. An explanation of these follows:

**Streams/Rivers:** The Forest River is located east of the Site and runs north to south. An un-named stream is located to the south of the Site. The stream runs east to west and discharges into the Forest River. These streams/rivers are not located within 500-feet of the Site.

**Wetlands/Vernal Pools:** According to the Natural Heritage & Endangered Species Program, Massachusetts Natural Heritage GIS Data Layers, there are no Priority Habitats of Rare Species, Estimated Habitats of Rare Wildlife or Certified Vernal Pools located within 500-feet of the Site.

**Ponds/Lakes:** According to the Site Locus Figure 1, there is an unnamed pond located immediately east of the Site. There are no other ponds or lakes within ½ mile of the Site.

**Reservoirs:** No Reservoirs are located within 500-feet of the Site.

**Sole Source Aquifers:** According to the MassDEP Phase I Map Figure 4, there are no Sole Source Aquifers within ½ mile of the Site.

**Zone II:** According to the MassDEP Site Scoring Map, Figure 4, the Site is not located within a Zone II.

**IWPA:** According to the MassDEP Site Scoring Map Figure 4, there are no Interim Wellhead Protection Areas within ½ mile of the Site.

**Zone A areas:** The Site is not located within a Zone A area.

**PPA:** According to the MassDEP Site Scoring Map Figure 4, the Site is not located within a Potentially Productive Aquifer.

**Public Well(s):** According to the Salem Board of Health, there are no public or private drinking water wells within 500 feet of the Site.

**ACEC:** No Areas of Critical Environmental Concern have been identified within ½ mile of the Site.

Protected Open Space: The Site is not located within an area identified as Protected Open Space.

Solid Waste Landfill: According to the MassDEP Site Scoring Map Figure 4, a solid waste landfill is located approximately 1,000 feet northeast of the Site.

## 5.0 DESCRIPTION IRA ACTIVITIES THROUGH OCTOBER 3, 2023

Response actions conducted at the Site in response to the reportable release condition include, but are not necessarily limited to, the following;

- File review of historical environmental due diligence reports;
- LSP site inspection with MassDEP officials;
- Preparation of an Imminent Hazard Evaluation Plan;
- Surficial soil sampling at five at locations on the 14 Barnes Road vacant property and 16 Barnes Road vacant property; and
- Access coordination with Berman Properties LLC to the Cedar Road Easement.

A summary of the response activities is described in the following sections.

### 5.1 Environmental Due Diligence File Reviews

The Site was investigated by the following consultants (report identification included) in 2020 for environmental contamination as part of environmental due diligence investigations:

- Geological Field Services, Inc (GFS) – Summary Report dated August 20, 2020;
- Chubb Global Risk Advisors- Phase II Environmental Site Assessment dated June 16, 2020; and
- Weston & Sampson- Summary of Work Memorandum dated November 17, 2020

The aforementioned reports revealed the following:

**14 and 16 Barnes Road:** Polychlorinated Biphenyls (PCBs), benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, bis(2-ethylhexyl) phthalate, and lead were detected in one or more soil samples at concentration exceeding the applicable Reporting Category RCS-1 threshold value. The highest reported concentration for each of the above referenced analytes is noted below:

- PCBs- 118.3 micrograms per kilogram (mg/kg)
- benzo(a)anthracene- 9.93 mg/kg

- benzo(a)pyrene- 6.47 mg/kg
- benzo(b)fluoranthene- 8.23 mg/kg
- bis(2-ethylhexyl) phthalate- 374 mg/kg
- lead- 1,800 mg/kg

**9 and 15 Cedar Road:** PCBs, bis(2-ethylhexyl) phthalate, and lead were detected in one or more soil samples at concentration exceeding the applicable Reporting Category RCS-1 threshold value. The highest reported concentration for each of the above referenced analytes is noted below:

- PCBs- 21.3 mg/kg
- bis(2-ethylhexyl) phthalate- 4,190 mg/kg
- lead- 1,220 mg/kg

**12 Cedar Road:** PCBs, bis(2-ethylhexyl) phthalate, arsenic, cadmium, chromium, and lead were detected in one or more soil samples at concentration exceeding the applicable Reporting Category RCS-1 threshold value. The highest reported concentration for each of the above referenced analytes is noted below:

- PCBs- 66 mg/kg
- bis(2-ethylhexyl) phthalate- 2,260 mg/kg
- arsenic- 21.4 mg/kg
- cadmium- 95.2 mg/kg
- chromium- 182 mg/kg
- lead- 2,050 mg/kg

**14 Cedar Road:** PCBs, 2-methylnaphthalene, bis(2-ethylhexyl) phthalate, barium, and lead were detected in one or more soil samples at concentration exceeding the applicable Reporting Category RCS-1 threshold value. The highest reported concentration for each of the above referenced analytes is noted below:

- PCBs- 22.3 mg/kg
- chromium- 258 mg/kg
- 2-methylnaphthalene- 2.24 mg/kg
- bis(2-ethylhexyl) phthalate- 793 mg/kg
- barium- 1,130 mg/kg
- lead- 2,070 mg/kg

**16 Cedar Road:** PCBs, bis(2-ethylhexyl) phthalate, 2-methylnaphthalene, arsenic, barium, chromium, and lead were detected in one or more soil samples at concentration exceeding the applicable Reporting Category RCS-1 threshold value. The highest reported concentration for each of the above referenced analytes is noted below:

- PCBs- 6.76 mg/kg
- 2-methylnaphthalene- 2.15 mg/kg
- bis(2-ethylhexyl) phthalate- 1,110 mg/kg
- arsenic- 97.9 mg/kg
- barium- 1,340 mg/kg
- chromium- 151 mg/kg
- lead- 21,800 mg/kg

It should be noted that JMI Realty Trust and JL Realty Trust submitted a Bureau of Waste Cleanup Release Notification Form-103 to the MassDEP on July 9, 2023 for a 120-day notification condition triggered at 16 Barnes Road and 9, 12, 14, 15, and 16 Cedar Road. This regulatory submittal was filed in response to the detection of heavy metals, PCBs and semi volatile organic compounds (SVOCs) in soil samples at concentrations greater than their respective Reportable Concentrations. MassDEP subsequently RTN 3-38210 to these properties for this 120-day reporting condition.

The sources of the above referenced contaminants in soil at the Disposal Site are suspected to be from historical filling/dumping activities that were performed in the circa 1940's through the 1970's. It was reported in the above referenced documents that shredded automotive material (i.e., autofluff), solid waste, used automotive parts, and fill material were observed during the course of the environmental due diligence investigations. Additional information on the parties involved with the transport, disposal and dumping of this material at the Site will be forthcoming in MCP report submittals.

## 5.2 MassDEP and LSP Site Inspection

On August 28, 2023, a Site inspection was conducted with representatives of MassDEP, Ash Desmond (Bureau of Waste Site Cleanup) and Andrew Danikas (asbestos inspector), and Michael Bricher, LSP, of BES. The inspection consisted of a walkthrough of 14 Barnes, 16 Barnes Road, 9 Cedar Road, 12 Cedar Road, and 15 Cedar Road. Due to the dense forest land, poison ivy/oak vegetation, thorns, ticks, wetlands, and terrain (i.e., physical barriers), access was limited at each of the aforementioned properties. A summary of Site observations is noted below.



- **16 Barnes Road:** This property was accessed from the south along Barnes Road. MassDEP and BES reviewed the area along the southern property boundary for the installation of a potential fence installation. We agreed that there would need to be a significant amount of tree/vegetation removal and to go around a bedrock outcrop to complete the fence installation along the southern property boundary line. It was also noted that a significant elevation drop at approximately 100 feet from the road going straight in towards 14/16 Barnes Road property boundary and that it would be unsafe to access 14 Barnes Road from the southwest. Also, we noted multiple construction/demolition/solid waste debris (i.e., brick, asphalt, concrete/tires/metal, broken tiles) along the property boundary for 14 and 16 Barnes Road. Asbestos Inspector Danikas collected two samples of the tile and roofing material for asbestos. It was later confirmed by MassDEP that the tile sample tested positive for asbestos.

According to the property owner, Kathleen Ingemi for JMI Realty Trust, this area of 16 Barnes Road has been subject to illegal dumping activities over the years by nearby owners. Nonetheless, this area of the Site will need to be assessed by a licensed asbestos inspector/management company.

- **14 Barnes Road:** MassDEP and BES accessed 14 Barnes Road from the west via 379-381 Highland Avenue. Access limited to the western most portion of 14 Barnes Road due to physical barriers. There was some solid waste debris (tires, metal, brick, concrete, abandoned storage shed)) observed in this area, but MassDEP asbestos inspector did not identify any potential asbestos containing material at the surface.
- **Cedar Road Properties:** MassDEP and BES accessed the Cedar Road properties via Berman Properties LLC/ KR Starr Realty Holdings property (Map 7, lot 58). A portion of this property is under construction. It was very difficult to identify these property boundaries in the field due to physical barriers and no survey stakes in the ground. Solid waste debris piles were observed sporadically throughout these piles. MassDEP did not collect any samples from these properties for asbestos analysis.

MassDEP and BES agreed that access to 14 Barnes Road, 12 Cedar Road, 14 Cedar Road and the immediate surrounding areas for soil sampling as part of the Imminent Hazard Evaluation will need to be accessed through the Cedar Road Easement from Berman Properties LLC, the property owner for the construction site located at 355 Highland Avenue. This construction project has blocked access to the Cedar Road Easement from Highland Avenue.

### **5.3 Imminent Hazard Evaluation Plan Regulatory Filing**

On behalf of JL Realty Trust, JMI Realty Trust, and Barnes Road Trust, BES filed an IH Evaluation Plan with MassDEP on September 15, 2023. The IH Evaluation Plan outlined a subsurface investigation scope of work and schedule to address the potential IH condition at the Site. A summary table of the Imminent Hazard Initial Site Assessment describing the proposed surficial soil investigation activities along with a Proposed Surficial Soil Sampling Location Plan depicting the proposed assessment locations have been included in Appendix B.

### **5.4 Surficial Soil Sampling Activities-14/16 Barnes Road**

On September 27, 2023, BES personnel conducted a surficial soil assessment program on 14 and 16 Barnes Road. The assessment program area was divided into 5 zones for surficial soil sampling. These five sampling zones were identified as SS-31, SS-32, SS-33, SS-34, and SS-35. The sampling zones were strategically selected to represent areas that would most easily be accessed in a trespasser scenario from Barnes Road. Approximately 330 feet of street frontage exists along the southern boundary for 16 Barnes Road. Refer to Figure 2-Soil Sample Location Map for a depiction of the five sampling zones.

As previously noted, this area of the Site consists of thick wooded vegetation with exposed bedrock outcroppings. Also, multiple construction/demolition/solid waste debris material (i.e., brick, asphalt, concrete/tires/metal, broken tiles) was observed during this assessment program.

The soil samples were collected at a depth of 0 to 1' below grade using a hand auger. The soil samples comprised mostly of organics with some silts, sands, and gravel. There were no overt petroleum odors, soil staining, or visual evidence of release of oil and/or hazardous material at these locations. Also, soil samples were field screened for total volatile organic compounds (TVOCs) with a photoionization detector (PID) equipped with a 10.6 eV lamp and calibrated to 100 ppmv isobutylene utilizing the MassDEP approved "Jar Headspace Analytical Screening Procedure". The PID screening reading results for all soil samples were non-detect (0.0 parts per million (ppm)).

A total of five soil samples (i.e., SS-31 through SS-35) were collected and submitted to New England Testing Laboratory (NET Lab) of West Warwick, RI under standard chain of custody (COC) procedures for the following analyses: MCP 14 Metals by EPA Method 6000/7000; and polychlorinated biphenyls (PCBs) by EPA Method 8082A. In addition, soil sample SS-32 was submitted for SVOC laboratory analysis via EPA Method 8270. These soil sample laboratory analytical results will be presented in the IRA Status Report # 1, anticipated for MassDEP submittal on or before December 5, 2023.

## **5.5 Cedar Road Easement Access Status**

In an attempt to perform environmental soil sampling activities at the vacant parcels located at 12 Cedar Road, 14 Cedar Road, and 14 Barnes Road, BES reached out to Michael P. Murphy, Esq. Regnante Sterio LLP, a representative of Berman Properties LLC to secure access to the Cedar Road Easement (i.e., a public way). Due to the fact that the Berman redevelopment project at Highland Avenue and Cedar Road is an asbestos cleanup site, a thorough decontamination program must be implemented during this environmental assessment.

At the request of Mr. Murphy, BES prepared a Standard Operating Procedure (SOP) memorandum for equipment decontamination for access to the Cedar Road Easement via a commercial truck. A copy of this SOP memorandum was provided to Mr. Murphy on October 3, 2023 and is included in Appendix C. Mr. Murphy has requested that the SOP be reviewed and approved by MassDEP prior to authorizing easement access from Berman Properties LLC to JL Realty Trust, JMI Realty Trust, and Barnes Road Trust.

## **6.0 REASON FOR, OBJECTIVES AND PROPOSED IRA ACTIVITIES**

In response to the detection of PCB and total chromium in the top 6 inches of soil at 12 Cedar Road, 14 Cedar Road, and 14 Barnes Road at concentrations greater than the notification threshold for the purpose of fulfilling the “Two Hour” release notification obligations of 310 CMR 30.0311(7), as a “Could Pose” Imminent Hazard to human health, an IRA is required to be conducted at the Site. The objectives of the IRA are to expediently abate, eliminate and prevent observed or potential imminent hazards, conditions of substantial release migration (SRM) or critical exposure pathways (CEPs) as a result of the release condition, contain and/or remove the PCB and total chromium that is present in surficial soil, and otherwise assess, secure and stabilize Disposal Site conditions. To accomplish this, BES, on behalf of JL Realty Trust, JMI Realty Trust, and Barnes Road Trust, proposes to continue the assessment and monitoring of subsurface conditions, and other response actions that may be required to contain and/or remove the contaminants of concern at the Disposal Site.

### **6.1 Containment Measure Actions**

At the time of release notification for 14 Barnes Road, BES presented a verbal IRA Plan to MassDEP to erect a 6-foot-high chain-link security fence along the southern boundary of 16 Barnes Road to restrict access to the heavy metal and PCB impacted surficial soil areas reported at the Site. Based on the MassDEP/BES Site Visit on August 28, 2023, there are logistical challenges (i.e., physical barriers) with installing a security fence along the southern boundary of 16 Barnes Road. Based on feedback received by BES from Mr. Erik Johnson of MassDEP BWSC on August 30, 2023, MassDEP would consider using the existing physical

barriers on 16 Barnes Road in lieu of a security fence if surficial soil data shows that the heavy metals and PCBs are below Imminent Hazard levels.

Following the completion of the upcoming IH Evaluation for potential trespasser exposure via dermal contact to soil at 14 and 16 Barnes Road, the need to supplement the existing physical barriers with additional containment measures will be assessed.

## **6.2 Subsurface Investigations**

Additional subsurface investigation will be performed to assess potential migration pathways of soil and groundwater and as otherwise deemed appropriate to assess the extent of the release. This assessment will include the surficial soil sampling, advancement of soil borings, and the installation of groundwater monitoring wells. It is anticipated that subsurface investigation activities will be performed at the Site as deemed appropriate based on a “Lines of Evidence” approach to evaluate potential migration pathways and the potential for exposure.

### Soil Assessment

It is proposed that soil sampling and wetland soil sampling will be performed during the IRA activities. Analysis will generally be performed for MCP 14 Metals, PCBs, extractable petroleum hydrocarbons (EPH), VOCs, and SVOCs. The soil sampling program will continue to be evaluated and changed on as needed basis, as deemed appropriate by the LSP.

### Groundwater Assessment

It is proposed that the installation of groundwater monitoring wells be performed at the Site followed by two rounds of groundwater sampling, or at a more frequent basis as deemed appropriate by the LSP during the IRA activities. Laboratory analysis will generally be performed for dissolved MCP 14 metals, VOCs, PCBs, EPH, volatile petroleum hydrocarbons (VPH), EPH, and Per and poly-fluoroalkyl substances (PFAS) during these initial IRA assessment activities. The groundwater monitoring well network will be evaluated and changed on as needed basis, as deemed appropriate by the LSP. Prior to sampling, the monitoring wells will be gauged for the presence of light and dense non aqueous phase liquid (NAPL) and depth to groundwater with an electronic interface probe.

## **7.0 IMMEDIATE HAZARD, CRITICAL EXPOSURE PATHWAYS, SUBSTANTIAL RELEASE MIGRATION AND CONDITION OF SUBSTANTIAL RELEASE MIGRATION**

### **7.1 Imminent Hazards**

Pursuant to 310 CMR 40.0426, an IH evaluation shall be performed as part of an IRA at sites where a release or threat of release could pose an IH to human health, safety, public welfare, or the environment, as described in 310 CMR 40.0321 and 40.0950.

An IH evaluation will be performed due to a potential trespasser exposure via dermal contact to soil at 14 and 16 Barnes Road for the soil sampling activities performed on September 27, 2023. The soil sampling results will be inputted into the MassDEP Imminent Hazard risk characterization shortforms. A copy of the MassDEP Imminent Hazard shortforms along with a summary evaluation letter will be provided to MassDEP during the week of October 16, 2023. Using the soil analytical results of the aforementioned sampling event, the evaluation will provide a conclusion as to whether an Imminent Hazard exists with respect to soil quality at the location sampled during the event.

The Site will continue to be assessed and monitored for potential Imminent Hazards.

### **7.2 Critical Exposure Pathways**

Pursuant to Section 310 CMR 40.0006, CEP are defined as those routes by which oil and/or hazardous material(s) released at a disposal site are transported, or are likely to be transported, to human receptors via vapor phase emissions into a living or working space of a pre-school, daycare, school, or occupied residential dwelling; or ingestion, dermal absorption or inhalation of measurable concentrations of oil and/or hazardous materials from drinking water supply wells located at and servicing a pre-school, daycare, school, or occupied residential dwelling.

Currently, the release conditions associated with RTN 3-38273 has not met any of the aforementioned requirements, and CEPs have not been identified for this RTN. The Site will continue to be monitored for potential CEP conditions.

### **7.3 Substantial Release Migration**

Based on the definition of a condition of Substantial Release Migration described in 310 CMR 40.0006, Site conditions were evaluated in terms of the likelihood of the existence of a condition of SRM. The conditions indicative of a condition of SRM, along with site specific responses that address the conditions follow:

- (a) ***Releases that have resulted in the discharge of separate-phase oil and/or hazardous material to surface waters, subsurface structures, or underground utilities or conduits*** - BES will continue to evaluate this during ongoing IRA activities;
- (b) ***Releases to the ground surface or to the vadose zone that, if not promptly removed or contained, are likely to significantly impact the underlying groundwater, or significantly exacerbate an existing condition of groundwater pollution*** – BES will continue to evaluate this during ongoing IRA activities.
- (c) ***Releases to the groundwater that have migrated or are expected to migrate more than 200 feet per year*** –BES will assess groundwater conditions during ongoing IRA activities.
- (d) ***Releases to the groundwater that have been or are within one year likely to be detected in a public or private drinking water well*** – The Site and surrounding area is serviced with municipal water. No private water supply wells are known to exist in the Site vicinity.
- (e) ***Releases to the groundwater that have been or are within one year likely to be detected in a surface water body, wetland, or public water supply reservoir*** BES will continue to evaluate this during ongoing IRA activities; *or*
- (f) ***Releases to the groundwater that have resulted or are within one year likely to result in the discharge of vapors into school building, daycare or child care center or occupied residential dwellings*** – BES will continue to evaluate this during ongoing IRA activities

The Site will continue to be assessed and monitored for SRM conditions.

## **8.0 MANAGEMENT OF IRA GENERATED WASTE**

It is anticipated that no remediation waste will be generated to conduct the IRA Plan described herein.

## 9.0 ANTICIPATED SCHEDULE OF IRA ACTIVITIES

A summary of anticipated IRA related activities and associated schedule is presented below:

<b>TASK DESCRIPTION</b>	<b>SCHEDULE</b>
Secure Access to the Cedar Road Easement from Berman Properties LLC/MassDEP	October 2023
Complete IH Evaluation for Soil Exposure at 14/16 Barnes Road	Week of October 16, 2023
Supplemental Surficial Soil Assessment-Cedar & Barnes Road Properties	Late October-Early November, 2023
IRA Status Report # 1	December 5, 2023

## 10.0 FEDERAL, STATE, AND/OR LOCAL REQUIRED PERMITS

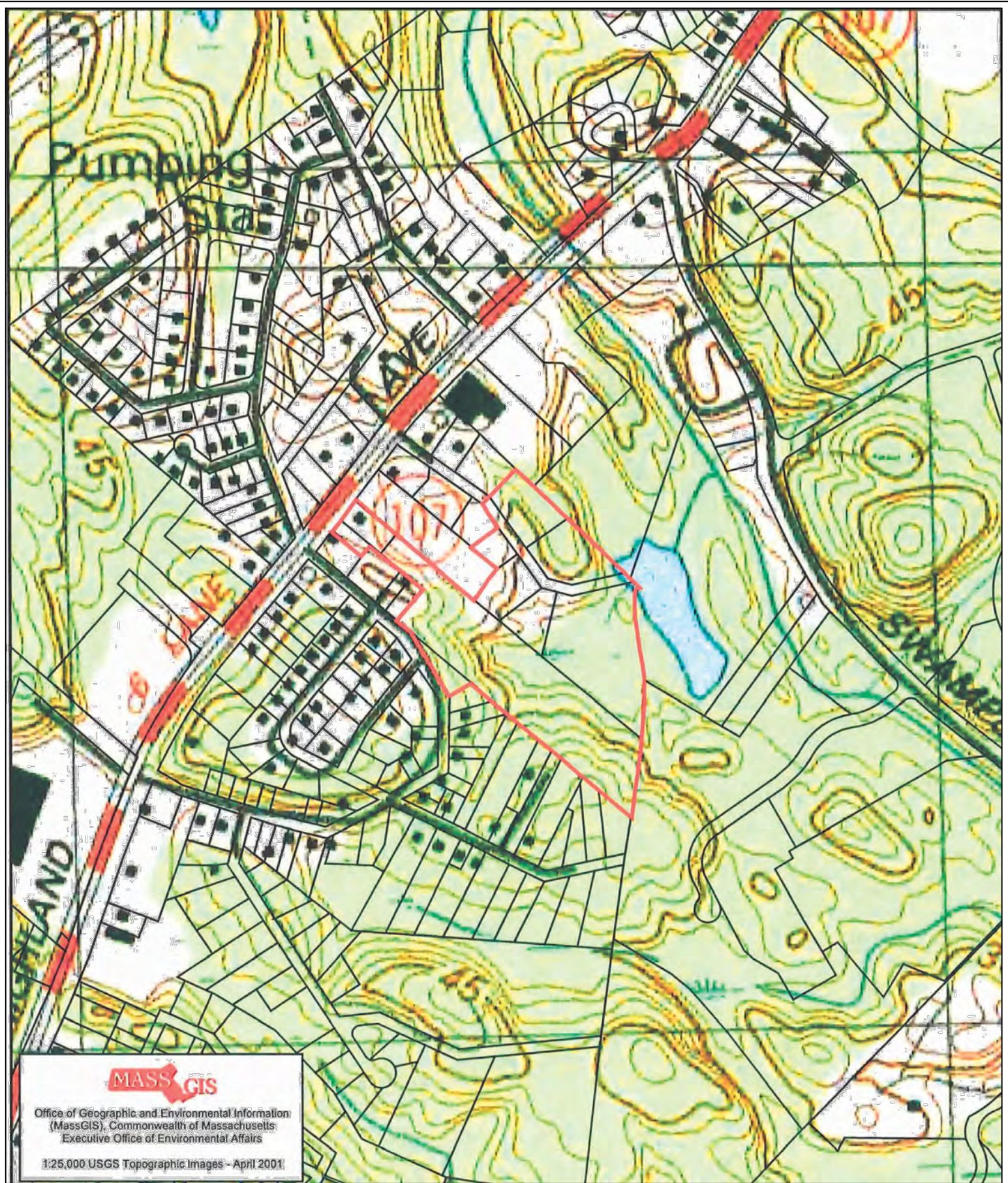
No permits are anticipated at this time for the implementation of this IRA Plan. However, if the work scope changes, all necessary permits will be obtained.

## 11.0 PUBLIC INVOLVEMENT

Pursuant to 310 CMR 40.1403(3)(b), public notification activities are required for implementation of IRA activities to prevent, control, abate or eliminate an IH or to address a CEP. Based on the initial conditions, a “Could Pose” Imminent Hazard to human health was identified; therefore, public notification for the IRA activities has been conducted. Copies of the public notification are included in Appendix D.

# FIGURES





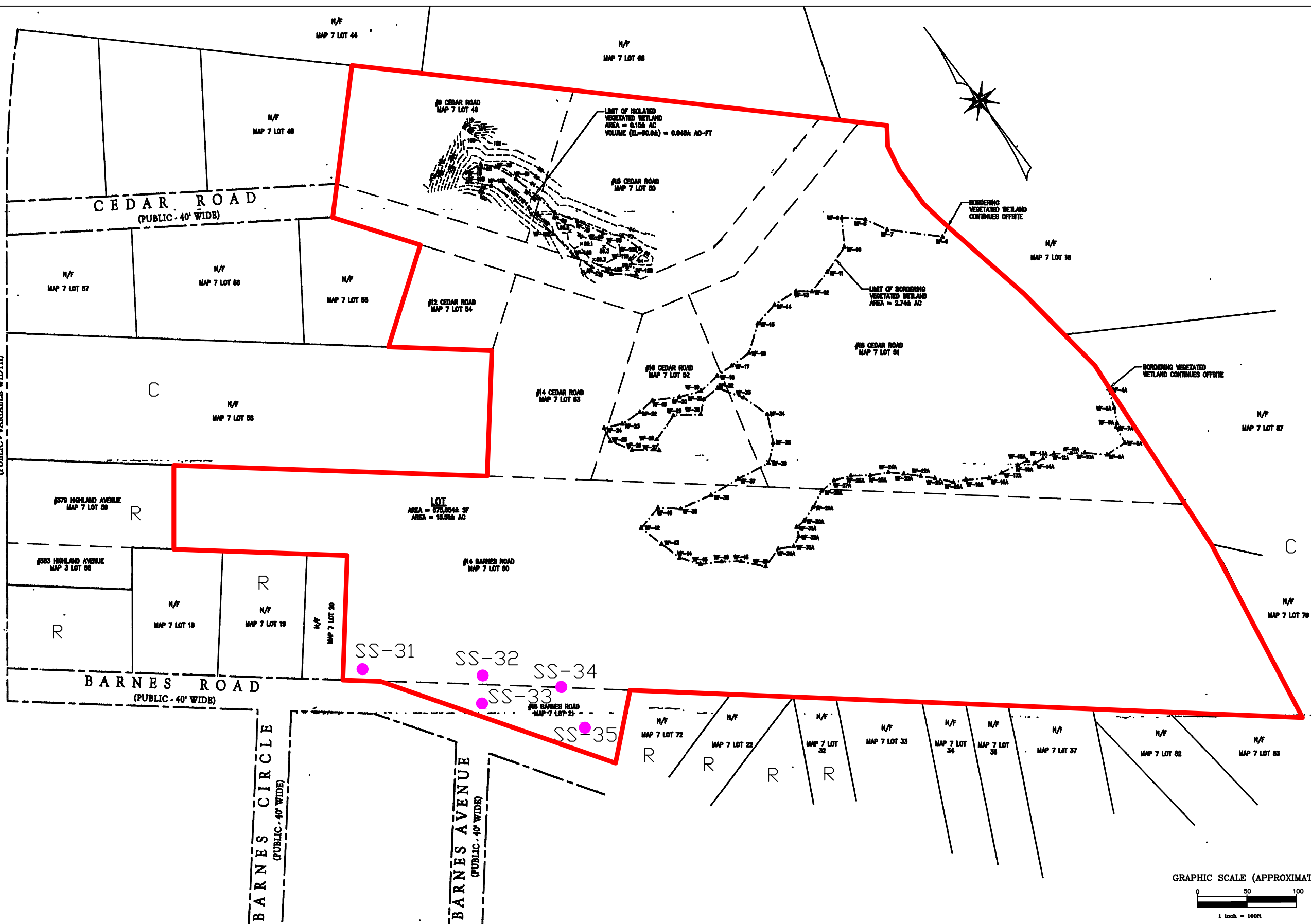
**MASS GIS**  
 Office of Geographic and Environmental Information  
 (MassGIS), Commonwealth of Massachusetts  
 Executive Office of Environmental Affairs  
 1:25,000 USGS Topographic Images - April 2001

SOURCE: SALEM AND LYNN, MA USGS QUADRANGLE TOPOGRAPHIC MAPS

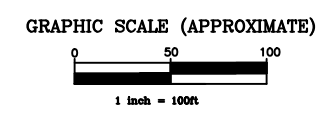
<b>SITE LOCUS</b>	
BLACKSTONE ENVIRONMENTAL SOLUTIONS, LLC. 76 BAY VIEW DRIVE SHREWSBURY, MASSACHUSETTS 01545 <small>TEL: (508) 612-0700</small>	
SCALE: NTS	LOCUS:
DATE: 09/06/2023	MULTIPLE PARCELS
DRAWN: KGP	HIGHLAND AVENUE, BARNES
PROJECT: 1843	ROAD, AND CEDAR ROAD
FIGURE: 1	SALEM, MASSACHUSETTS



HIGHLAND AVENUE  
(PUBLIC - VARIABLE WIDTH)

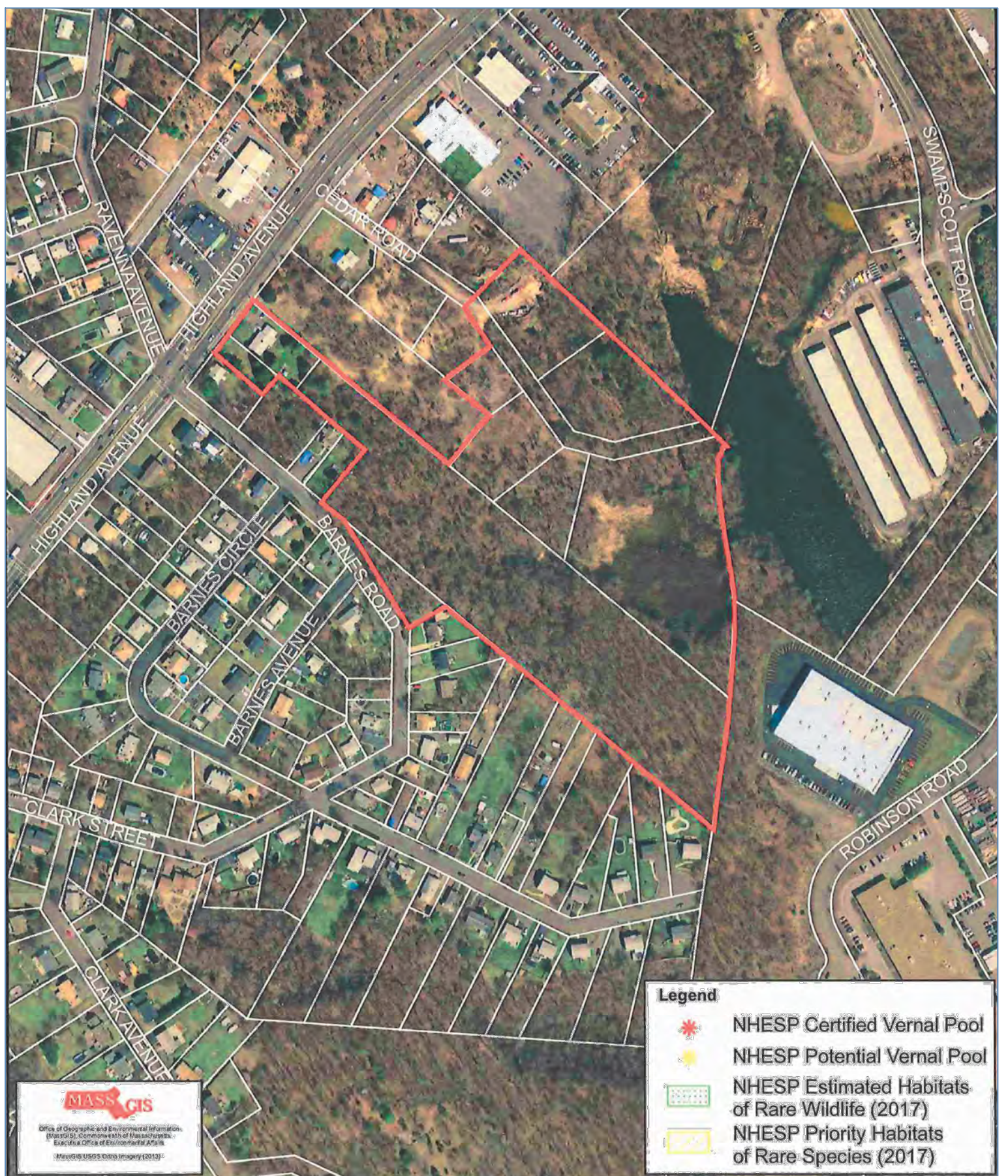


- LEGEND**
- : SUBJECT PARCELS BOUNDARY
  - : SURFICIAL SOIL SAMPLE
  - C : COMMERCIAL
  - R : RESIDENTIAL



<b>SITE PLAN</b>	
BLACKSTONE ENVIRONMENTAL SOLUTIONS, LLC. 76 BAY VIEW DRIVE SHREWSBURY, MASSACHUSETTS 01545 <small>TEL. (508) 853-0700</small>	
SCALE: 1" = 100'	MULTIPLE PARCELS HIGHLAND AVENUE, BARNES ROAD, AND CEDAR ROAD SALEM, MASSACHUSETTS
DATE: 10/3/2023	
DRAWN: KGP	
PROJECT: 1843	
FIGURE: 2	





SOURCE: SALEM AND LYNN, MA USGS QUADRANGLE TOPOGRAPHIC MAPS

**AERIAL PLAN**

BLACKSTONE ENVIRONMENTAL SOLUTIONS, LLC  
 76 BAY VIEW DRIVE  
 SHREWSBURY, MASSACHUSETTS 01545  
 TEL: (508) 618-0700

SCALE: NTS  
 DATE: 09/06/2023  
 DRAWN: KGP  
 PROJECT: 1843  
 FIGURE: 3

MULTIPLE PARCELS  
 HIGHLAND AVENUE, BARNES  
 ROAD, AND CEDAR ROAD  
 SALEM, MASSACHUSETTS



# MassDEP - Bureau of Waste Site Cleanup

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

### Site Information:

FIGURE 4  
14 CEDAR ROAD SALEM, MA

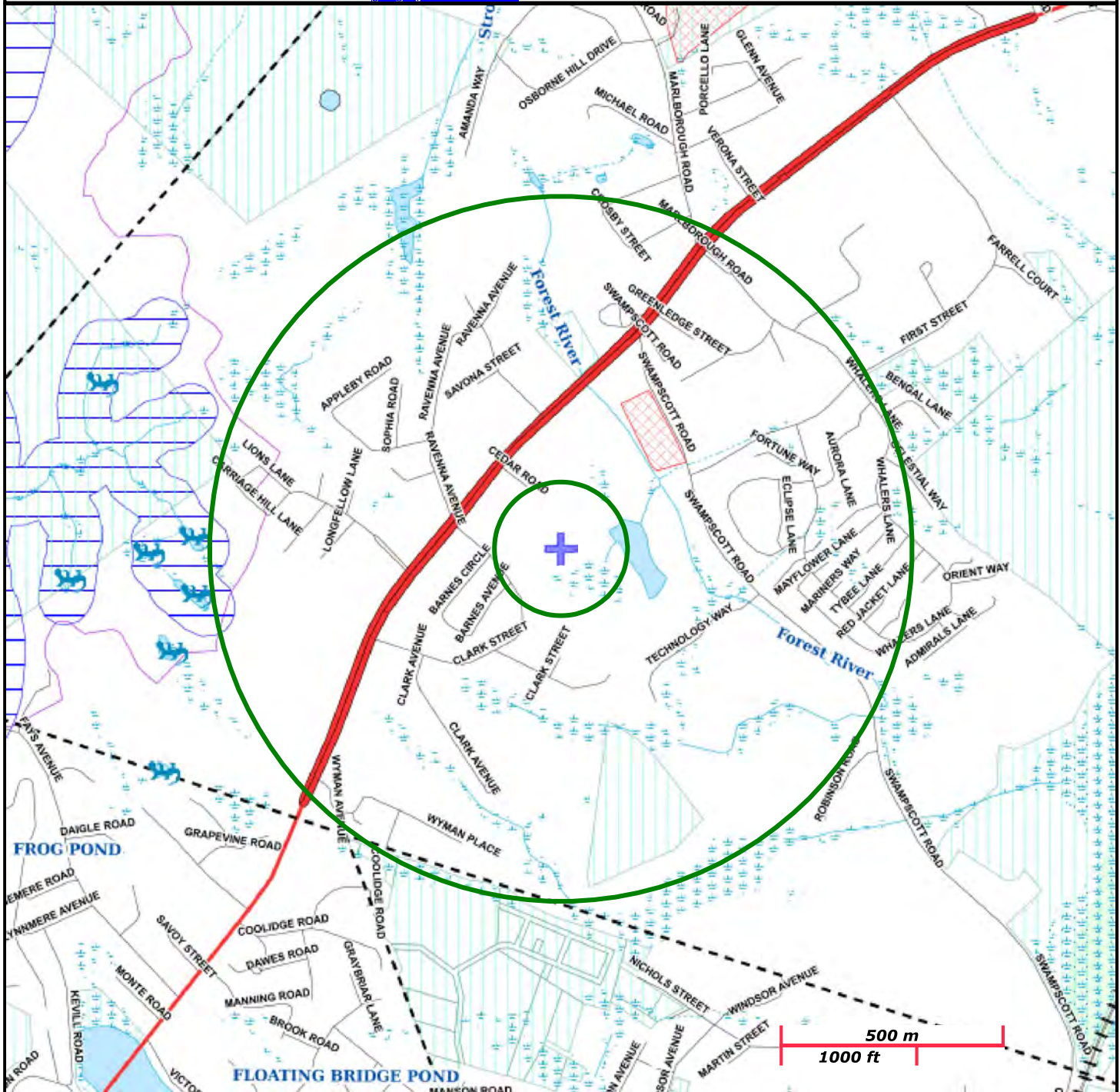
NAD83 UTM Meters:  
4706727mN, 341563mE (Zone: 19)  
October 3, 2023

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.



# **APPENDIX A**



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

Northeast Regional Office • 150 Presidential Way Woburn, MA 01801 • 978-694-3200

Maura T. Healey  
Governor

Kimberly Driscoll  
Lieutenant Governor

Rebecca L. Tepper  
Secretary

Bonnie Heiple  
Commissioner

### **URGENT LEGAL MATTER: PROMPT ACTION NECESSARY**

August 31, 2023

Kathleen Ingemi, as Trustee of  
Barnes Road Trust  
381 Highland Avenue  
Salem, MA 01970

RE: SALEM-  
12 Cedar Road, 14 Cedar Road, &  
14 Barnes Road  
Notice of Responsibility  
RTN 3-38273

Certified Mail No: 7022 2410 0000 7501 3378

### **NOTICE OF RESPONSIBILITY; MGL c. 21E & 310 CMR 40.0000**

Dear Kathleen Ingemi:

On August 7, 2023, at 5:11 p.m., the Massachusetts Department of Environmental Protection (MassDEP) received oral notification of a release/threat of release of Oil/Hazardous Material at the subject location, which requires one or more Response Actions. Based on this information, MassDEP has reason to believe that the subject property or portion(s) thereof is a disposal site as defined in the Massachusetts Oil and Hazardous Material Release Prevention and Response Act, M.G.L. c. 21E and the Massachusetts Contingency Plan (MCP), 310 CMR 40.0000. M.G.L. c.21E and the MCP govern the assessment and cleanup of Disposal Sites.

The purpose of this notice is to inform you (as used in this letter "you" refers to Kathleen Ingemi, as Trustee of Barnes Road Trust) of your legal responsibilities under state law for assessing and/or remediating the subject release. For purposes of this notice, the terms and phrases used herein shall have the meaning ascribed to them by the MCP unless the text clearly indicates otherwise.

This information is available in alternate format. Please contact Melixza Esenyie at 617-626-1282.  
TTY# MassRelay Service 1-800-439-2370  
MassDEP Website: [www.mass.gov/dep](http://www.mass.gov/dep)

Printed on Recycled Paper

### **STATUTORY LIABILITIES**

MassDEP also has reason to believe that you are a Potentially Responsible Party (PRP) with liability under M.G.L. c. 21E, Section 5, for Response Action Costs. Section 5 makes the following parties liable to the Commonwealth of Massachusetts: current owners or operators of a site from or at which there is or has been a release/threat of release of oil or hazardous material; any person who owned or operated a site at the time hazardous material was stored or disposed of; any person who arranged for the transport, disposal, storage or treatment of hazardous material to or at a site; any person who transported hazardous material to a transport, disposal, storage or treatment site from which there is or has been a release/threat of release of such material; and any person who otherwise caused or is legally responsible for a release/threat of release of oil or hazardous material at a site.

This liability is "strict" meaning that it is not based on fault but solely on your status as owner, operator, generator, transporter or disposer. It is also "joint and several", meaning that you may be liable for all response action costs incurred at the site, regardless of the existence of any other liable parties.

The MCP requires responsible parties to take necessary Response Actions at properties where there is or has been a release or threat of release of oil and/or hazardous material. If you do not take the necessary Response Actions or fail to perform them in an appropriate and timely manner, MassDEP is authorized by M.G.L. c. 21E to have the work performed by its contractors. By taking such actions, you can avoid liability for Response Action Costs incurred by MassDEP and its contractors in performing these actions, and any sanctions, which may be imposed, for failure to perform Response Actions under the MCP.

You may be liable for up to three (3) times all Response Action Costs incurred by MassDEP. Response Action Costs include, without limitation, the cost of direct hours spent by MassDEP employees arranging for response actions or overseeing work performed by persons other than MassDEP or its contractors, expenses incurred by MassDEP in support of those direct hours, and payments to MassDEP's contractors. (For more detail on cost liability, see 310 CMR 40.1200.)

MassDEP may also assess interest on costs incurred at the rate of twelve percent (12%), compounded annually. To secure payment of this debt, the Commonwealth may place liens on all of your property in the Commonwealth. To recover the debt, the Commonwealth may foreclose on these liens or the Attorney General may bring legal action against you. In addition to your liability for up to three (3) times all response action costs incurred by MassDEP, you may also be liable to the Commonwealth for damages to natural resources caused by the release. Civil and criminal liability may also be imposed under M.G.L. c. 21E, § 11, and civil administrative penalties may be imposed under M.G.L. c. 21A, § 16 for each violation of M.G.L. c. 21E, the MCP, or any order, permit or approval issued hereunder.



### **NECESSARY RESPONSE ACTIONS**

The subject site shall not be deemed to have all the necessary and required Response Actions taken unless and until all Substantial Hazards presented by the site have been eliminated and a level of No Significant Risk exists or has been achieved in compliance with M.G.L. c. 21E and the MCP. In addition, the MCP requires persons undertaking Response Actions at Disposal Sites to perform Immediate Response Actions (IRAs) in response to "sudden releases", Imminent Hazards and Substantial Release Migration. Such persons must continue to evaluate the need for IRAs and notify MassDEP immediately if such a need exists.

**MassDEP has determined that an IRA is necessary to respond to a Could Pose Imminent Hazard condition at the subject site. Pursuant to 310 CMR 40.0426(2), an Imminent Hazard Evaluation shall be initiated within 14 days of obtaining knowledge of a Could Pose Imminent Hazard Condition.**

**You are authorized to conduct only the specific response actions for which you received oral approval from MassDEP. All additional Immediate Response Actions require MassDEP approval in accordance with 310 CMR 40.0420.**

**MassDEP reminds you that IRAs must include site assessment activities necessary to evaluate potential Imminent Hazard (IH), Substantial Release Migration (SRM), and Critical Exposure Pathway (CEP) conditions.**

You must employ or engage a Licensed Site Professional (LSP) to manage, supervise or actually perform the necessary response actions at the subject site. In addition, the MCP requires persons undertaking response actions at a disposal site submit to MassDEP a Permanent Solution Statement prepared by an LSP in accordance with 310 CMR 40.1000 upon determining that a level of No Significant Risk already exists or has been achieved at a disposal site or portion thereof. You may obtain a list of the names and addresses of these licensed professionals from the Board of Registration of Hazardous Waste Site Cleanup Professionals at (617) 556-1091 or <http://www.mass.gov/eea/agencies/lsp/>.

There are several other submittals required by the MCP which are related to release notification and/or Response Actions that may be conducted at the subject site in addition to a Permanent Solution Statement that, unless otherwise specified by MassDEP, must be provided to MassDEP within specific regulatory timeframes. The submittals are as follows:

- (1) If information is obtained after making an oral or written notification to indicate that the release or threat of release didn't occur, failed to meet the reporting criteria at 310 CMR 40.0311 through 40.0315, or is exempt from notification pursuant to 310 CMR 40.0317, a Notification Retraction may be submitted within 60 days of initial notification pursuant to 310 CMR 40.0335;
- (2) If a Notification Retraction has not been submitted, a Release Notification Form (RNF) must be submitted to MassDEP pursuant to section 310 CMR 40.0333 within 60 calendar days of



the initial date of oral notification to MassDEP of a release pursuant to 310 CMR 40.0300 or from the date MassDEP issues a Notice of Responsibility (NOR), whichever occurs earlier. The RNF can either be submitted electronically or using the PDF Form at <http://www.mass.gov/eea/docs/dep/cleanup/approvals/bwsc-103.pdf>;

- (3) Documentation of an Imminent Hazard Evaluation, completed in accordance with 310 CMR 40.0950, must be submitted to MassDEP within 60 days of obtaining knowledge of the Could Pose Imminent Hazard Condition pursuant to 310 CMR 40.0426(2). The IH Evaluation must include an LSP Opinion as to whether an Imminent Hazard exists at the site and must document all Method 3 Risk Characterization equations and factors used to make such a determination. If a conclusion on the existence of an IH cannot be made within the 60-day timeline, the IH Evaluation must include the following information:
  - (a) a description of investigative efforts that have been made and remain to be taken in order to determine whether an Imminent Hazard to human health actually exists at the site, as well as a timetable for the remaining activities; or
  - (b) a plan to undertake removal and/or containment actions at the site to address those conditions that could pose an Imminent Hazard to human health.
- (4) Unless a Permanent Solution Statement or Downgradient Property Status Submittal is provided to MassDEP earlier, an Immediate Response Action (IRA) Plan prepared in accordance with 310 CMR 40.0420, or an IRA Completion Statement (310 CMR 40.0427) must be submitted to MassDEP within 60 calendar days of the initial date of oral notification to MassDEP of a release pursuant to 310 CMR 40.0300 or from the date MassDEP issues an NOR, whichever occurs earlier; and
- (5) Unless a Permanent Solution Statement or Downgradient Property Status Submittal is provided to MassDEP earlier, a completed Tier Classification Submittal pursuant to 310 CMR 40.0510 must be submitted within one year of the initial date of notification of a release pursuant to 310 CMR 40.0300 or from the date MassDEP issues an NOR, whichever occurs earlier or as otherwise specified by the Department in an Interim Deadline or order issued pursuant to 310 CMR 40.0501 (2).
- (6) Pursuant to MassDEP's "Timely Action Schedule and Fee Provisions", 310 CMR 4.00, the appropriate fee must be included with a Permanent Solution Statement that is submitted to MassDEP more than 120 calendar days after the initial date of oral notification to MassDEP of a release pursuant to 310 CMR 40.0300, or more than 120 calendar days after the date MassDEP issues an NOR, whichever occurs earlier, and before Tier Classification. A fee is not required for a Permanent Solution Statement submitted to MassDEP within 120 days of the date of oral notification to MassDEP, or within 120 days of the date MassDEP issues an NOR, whichever date occurs earlier, or after Tier Classification.

It is important to note that you must dispose of any Remediation Waste generated at the subject location in accordance with 310 CMR 40.0030 including, without limitation, contaminated soil and/or debris. Any Bill of Lading accompanying such waste must bear the seal and signature of

an LSP or, if the response action is performed under the direct supervision of MassDEP, the signature of an authorized representative of MassDEP.

MassDEP encourages parties with liability under M.G.L. c. 21E to take prompt action in response to releases and threats of release of oil and/or hazardous material. By taking prompt action, you may significantly lower your assessment and cleanup costs and avoid the imposition of, or reduce the amount of, certain annual compliance fees for response actions payable under 310 CMR 4.00.

If you have any questions relative to this notice, you should contact Erik Johnson by email at [erik.johnson@mass.gov](mailto:erik.johnson@mass.gov), at the letterhead address or by calling (781) 400-4378. All future communications regarding this release should reference the Release Tracking Number contained in the subject block of this letter.

Sincerely,



Joanne Fagan  
Section Chief, Brownfields/Risk Reduction  
Bureau of Waste Site Cleanup  
Northeast Regional Office

CC:

Stephen S. Ingemi, as Trustee of J. L. Realty Trust, 16 Vista Avenue, Salem, MA 01970  
Certified Mail No: 7022 2410 0000 7501 3385

eCC:

Mr. David Greenbaum, RS., Public Health Agent, Board of Health, City of Salem,  
[dgreenbaum@salem.com](mailto:dgreenbaum@salem.com)

Elizabeth Rennard, City Solicitor, City of Salem, [brennard@salem.com](mailto:brennard@salem.com)

Jamy Madeja, Esq., Buchanan & Associates, [jmadeja@buchananassociated.com](mailto:jmadeja@buchananassociated.com)

Michael Bricher, LSP of Record, Blackstone Environmental Solutions, [mbricher@bes-env.com](mailto:mbricher@bes-env.com)  
MassDEP data entry/file (NOR / Issued)



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

Northeast Regional Office • 150 Presidential Way Woburn, MA 01801 • 978-694-3200

Maura T. Healey  
Governor

Kimberly Driscoll  
Lieutenant Governor

Rebecca L. Tepper  
Secretary

Bonnie Heiple  
Commissioner

### **URGENT LEGAL MATTER: PROMPT ACTION NECESSARY**

August 31, 2023

Stephen S. Ingemi, as Trustee of  
J. L. Realty Trust  
16 Vista Avenue  
Salem, MA 01970

RE: SALEM-  
12 Cedar Road, 14 Cedar Road, &  
14 Barnes Road  
Notice of Responsibility  
RTN 3-38273

Certified Mail No.: 7022 2410 0000 7501 3354

### **NOTICE OF RESPONSIBILITY; MGL c. 21E & 310 CMR 40.0000**

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This information is available in alternate format. Please contact Melixza Esenyie at 617-626-1282.  
TTY# MassRelay Service 1-800-439-2370  
MassDEP Website: [www.mass.gov/dep](http://www.mass.gov/dep)

Printed on Recycled Paper

## **STATUTORY LIABILITIES**

MassDEP also has reason to believe that you are a Potentially Responsible Party (PRP) with liability under M.G.L. c. 21E, Section 5, for Response Action Costs. Section 5 makes the following parties liable to the Commonwealth of Massachusetts: current owners or operators of a site from or at which there is or has been a release/threat of release of oil or hazardous material; any person who owned or operated a site at the time hazardous material was stored or disposed of; any person who arranged for the transport, disposal, storage or treatment of hazardous material to or at a site; any person who transported hazardous material to a transport, disposal, storage or treatment site from which there is or has been a release/threat of release of such material; and any person who otherwise caused or is legally responsible for a release/threat of release of oil or hazardous material at a site.

This liability is "strict" meaning that it is not based on fault but solely on your status as owner, operator, generator, transporter or disposer. It is also "joint and several", meaning that you may be liable for all response action costs incurred at the site, regardless of the existence of any other liable parties.

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If you have any questions relative to this notice, you should contact Erik Johnson by email at [erik.johnson@mass.gov](mailto:erik.johnson@mass.gov), at the letterhead address or by calling (781) 400-4378. All future communications regarding this release should reference the Release Tracking Number contained in the subject block of this letter.

Sincerely,



Joanne Fagan  
Section Chief, Brownfields/Risk Reduction  
Bureau of Waste Site Cleanup  
Northeast Regional Office

CC:

Kathleen Ingemi, as Trustee of Barnes Road Trust, 381 Highland St, Salem, MA, 01970  
Certified Mail No.: 7022 2410 0000 7501 3361

eCC:

Mr. David Greenbaum, RS., Public Health Agent, Board of Health, City of Salem,  
[dgreenbaum@salem.com](mailto:dgreenbaum@salem.com)

Elizabeth Rennard, City Solicitor, City of Salem, [brennard@salem.com](mailto:brennard@salem.com)

Jamy Madeja, Esq., Buchanan & Associates, [jmadeja@buchananassociated.com](mailto:jmadeja@buchananassociated.com)

Michael Bricher, LSP of Record, Blackstone Environmental Solutions, [mbricher@bes-env.com](mailto:mbricher@bes-env.com)  
MassDEP data entry/file (NOR / Issued)

## **APPENDIX B**



**IMMINENT HAZARD INITIAL SITE ASSESSMENT PLAN**

Multiple Parcels

14 Barnes Road and 12 and 14 Cedar Road

Salem, MA

Sample ID and Depth	Location	Matrix	Sample Results	Report and Sampling Date	Soil Sampling Plan	Analytical Method	Rationale	Comments
D-3 (0-1')	12 Cedar Road	Soil	Lead 790 ppm; PCBs- 30.7 ppm	W&S 10/8/20	Collect 0-1' soil samples from # 1 through # 6	MCP 14 metals; PCBs-EPA 8082; and Select samples for SVOCs -EPA 8270	IHE Source and Extent Assessment at 12 Cedar Road	Two soil sample locations are located on Cedar Road
F-3 (0-.5')	12 Cedar Road	Soil	PCBs- 66 ppm	W&S 10/7/20				
B-5 (0-1')	12 Cedar Road	Soil	Lead 610 ppm; PCBs- 0.65 ppm	W&S 10/9/20				
F-5 (0-1')	12 Cedar Road	Soil	Lead 260 ppm; PCBs- 2.87 ppm	W&S 10/8/20				
D-9 (0-1')	14 Cedar Road	Soil	Lead 1,100 ppm; PCBs- 19.4 ppm	W&S 10/8/20	Collect 0-1' soil samples from # 7 through # 16	MCP 14 metals; PCBs-EPA 8082; and Select samples for SVOCs -EPA 8270	IHE Source and Extent Assessment at 14 Cedar Road	Points of compliance at J-7 and F-11 incorporated into sampling plan. One soil sample is located on Cedar Road
F-11 (0-1')	14 Cedar Road	Soil	Lead 110 ppm; PCBs- 0.6 ppm	W&S 10/7/20				
J-9 (0-0.5')	14 Cedar Road	Soil	Lead ---- ppm; PCBs- 20.2 ppm	W&S 10/6/20				
J-11 (0-1')	14 Cedar Road	Soil	Lead 53ppm; PCBs- 1.71 ppm	W&S 10/6/20				
J-11 (0-0.5')	14 Cedar Road	Soil	Lead ----ppm; PCBs- 2.43 ppm	W&S 10/6/20				
J-7 (0-0.5')	14 Cedar Road	Soil	Lead --- ppm; PCBs- <0.44 ppm	W&S 10/6/20				
H-7 (0-1')	14 Cedar Road	Soil	Lead 1,100 ppm; PCBs- 5.8 ppm	W&S 10/6/20				
L-9 (0-0.5')	14 Cedar Road	Soil	Lead ----ppm; PCBs- 1.46 ppm	W&S 10/9/20				
L-9 (0-1')	14 Cedar Road	Soil	Lead 645 ppm; PCBs- ---- ppm	W&S 10/9/20				
SS-4 Shallow (0-0.5')	14 Cedar Road	Soil	Lead 380 ppm; PCBs- 5.9 ppm	Chubb 1/31/20				

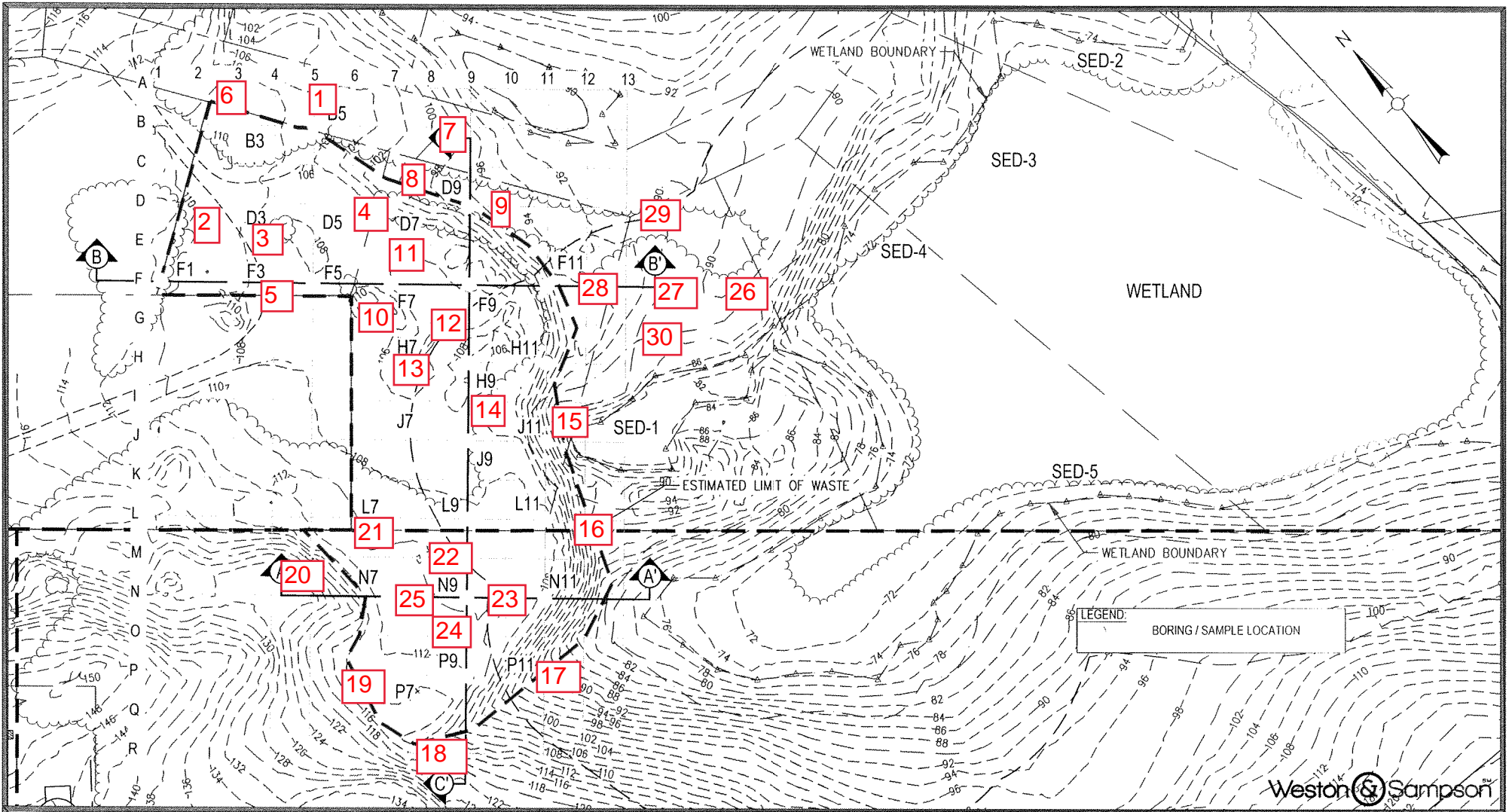
**IMMINENT HAZARD INITIAL SITE ASSESSMENT PLAN**

Multiple Parcels

14 Barnes Road and 12 and 14 Cedar Road

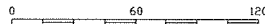
Salem, MA

Sample ID and Depth	Location	Matrix	Sample Results	Report and Sampling Date	Soil Sampling Plan	Analytical Method	Rationale	Comments
SS-1 Shallow (0-0.5')	14-16 Cedar Road	Soil	Lead 1010 ppm; PCBs- ---- ppm	Chubb 1/31/20	Collect 0-1' soil samples from # 26 through # 30	MCP 14 metals; PCBS-EPA 8082; and Select samples for SVOCs -EPA 8270	IHE Source and Extent Assessment at 14 Cedar Road	SS-2 located in close proximity to the 16 Cedar Road property boundary. Hexavalent and Trivalent Chromium to be included in the sampling plan
SS-2 Shallow (0-0.5')	14-16 Cedar Road	Soil	Lead-2,650 ppm; PCBs- -- ppm; Total Chromium 258 ppm	Chubb 1/31/20				
N-11 (0-0.5')	14 Barnes Road	Soil	Lead ----ppm; PCBs- <0.44 ppm	W&S 10/9/20	Collect 0-1' soil samples from # 17 through # 25	MCP 14 metals; PCBS-EPA 8082; and Select samples for SVOCs -EPA 8270	IHE Source and Extent Assessment at 14 Barnes Road	Point of Compliance samples collected at N-11 incorporated into sampling plan
N-11 (0-1')	14 Barnes Road	Soil	Lead 13 ppm; PCBs- <0.44 ppm	W&S 10/9/20				
N-9 (0-0.5')	14 Barnes Road	Soil	Lead ----ppm; PCBs- 118.3 ppm	W&S 10/8/20				
P-9 (0-0.5')	14 Barnes Road	Soil	Lead ----ppm; PCBs- 19.7 ppm	W&S 10/5/20				
N-7 (0-0.5')	14 Barnes Road	Soil	Lead ----ppm; PCBs- 32.4 ppm	W&S 10/9/20				
N-7 (0-1')	14 Barnes Road	Soil	Lead 49 ppm; PCBs- 1.3 ppm	W&S 10/9/20				
NA	16 Barnes Road	Soil	Lead ----ppm; PCBs- ---ppm	NA	Collect 0-1' soil samples from # 31 through # 35	MCP 14 metals; PCBS-EPA 8082; and Select samples for SVOCs -EPA 8270	Provide southern delineation area for IH level impacted soils	Determine if Points of Compliance exist on this property in support of eliminating need to install security fence



# - Proposed Surficial Soil Sampling Location

FIGURE 1  
OVERLOOK ACRES  
SALEM, MA  
SITE PLAN  
SCALE: 1"=60'



# DRAFT



CEDAR RD

6

9

10

373

12

15

14

16

18

BARNES RD

31

32

33

16

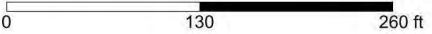
34

35

Proposed Surficial Soil Samples 31 through 35 to be collected as part of Imminent Hazard Evaluation

The data shown on this site are provided for informational and planning purposes only. The Town and its consultants are not responsible for the misuse or misrepresentation of the data.

- MA Places
  - Fire Station
  - Police Station
  - Town Hall
  - Public Library
  - School
- Buildings
- City Owned Parks
- TaxParcels
- Town Boundary
- MA Highways
  - Interstate
  - US Highway
  - Numbered Routes
- Abutting Town Labels
- Abutting Towns - No Label
- Bathymetry
  - 0-5 ft
  - 5-10 ft
  - 10-15 ft
  - 15-20 ft
  - 20-30 ft
  - 30-40 ft
  - 40-50 ft
  - 50-60 ft
  - 60-70 ft
  - 70+ ft
- Streets



## **APPENDIX C**

# Blackstone Environmental Solutions, LLC

-----  
Environmental Consulting and Licensed Site Professional Services

## MEMORANDUM

Date: October 3, 2023  
To: Michael P. Murphy, Esq. Regnante Sterio LLP  
Re: Standard Operating Procedures for Equipment Decontamination through the Cedar Road Easement, Salem, MA- MassDEP RTNs 3-38273 & 3-38210  
From: Michael Bricher, LSP

BES has prepared this memorandum on behalf of JL Realty Trust, JMI Realty Trust, and Barnes Road Trust to serve as a Standard Operating Procedure (SOP) for equipment decontamination during access to the Cedar Road Easement via a commercial truck. The purpose for accessing the Cedar Road Easement is to perform environmental soil sampling activities at the vacant parcels located at 12 Cedar Road, 14 Cedar Road, and 14 Barnes Road in accordance with the Massachusetts Contingency Plan. Because of the potential for the sampling equipment to be a potential source of contamination, a thorough decontamination program must be implemented during this environmental assessment. This SOP covers the decontamination of the commercial truck tires as well as the sampling equipment, including shovels, hand augers, scoops, or other devices used to collect soil samples. Refer to the attached drawing provided to BES by Berman Properties LLC (Berman) (Cedar Road Access Request Map) depicting the proposed travel path, decontamination zone, and parking area zone for this environmental soil assessment project.

BES is aware that the Berman redevelopment at Highland Avenue and Cedar Road is an asbestos cleanup site, and that you and/or representatives of Berman will be reaching out to the MassDEP for acceptance of this decontamination SOP prior to access authorization to the Cedar Road Easement.

It should also be noted that this decontamination SOP will be utilized in future assessment mobilization/demobilization events when accessing this route. The assessment will be an iterative process as necessary until the Site has been fully delineated, and a remedial action design plan can be prepared for the Site.

### 1.1 Equipment/Supplies

Below is a list of equipment and materials that will be used for this environmental assessment project.

- Commercial truck
- Non-sudsing detergent (Alconox, Liquinox, etc.);

Blackstone Environmental Solutions, LLC  
76 Bay View Drive Shrewsbury MA 01545  
(508) 612-4738 · bes-env.com

- Distilled water;
- Squirt/wash bottle;
- Scrub brush;
- 5-gallon plastic buckets (2);
- Plastic sheeting;
- Paper towels;
- Field log book;
- Hand tools (stainless hand augers, shovels, stainless steel mixing bowls, trowel, etc.);
- Sample containers (laboratory-supplied 2 or 4 oz. wide-mouth glass jars);
- Camera / cell phone equipped with camera;
- Measuring tape;
- Survey stakes; and
- Garbage bags.

## **1.2 Decontamination Procedures**

This section outlines specific procedures for decontamination of the non-disposable sampling equipment and tools used in collection of soil samples and the commercial vehicle.

### *Sampling Equipment Decontamination*

To reduce the spread of contaminants, a sampling equipment decontamination station will be set up along the Cedar Road Easement, adjacent to the proposed truck parking area (refer to the attached map). The proposed truck parking area is centrally located in the environmental soil assessment study area. All sampling equipment and sampling supplies shall be maintained within this area along the Cedar Road Easement.

The minimum required steps in the decontamination procedure (including setup) are outlined below.

- Lay out plastic sheeting layer at the sampling equipment decontamination station to prevent mixture with overlying soils;
- Prepare a detergent solution in one of the buckets;
- Partially fill the second bucket with distilled water;
- Remove soil or other material on the sampling device with tools or paper towels;
- After the materials are removed from the sampling device, immerse the device in the detergent solution and scrub with the brush;

- Remove the device from the detergent solution and allow to drain for a moment prior to immersing the device in the rinse water bucket;
- Immerse the device in the rinse water bucket and agitate the device; and
- Remove the device from the rinse water and give the device a final rinse with copious amounts of water from the squirt/wash bottle. Allow the water to drain from the device.

The device may be returned to use. If the device will be stored prior to its next use, cover the device with plastic and store at a location away from potential sources of contamination.

### Commercial Vehicle Decontamination

BES commercial vehicle to be used for the surficial soil sampling at the vacant parcels located at 12 Cedar Road, 14 Cedar Road, and 14 Barnes Road soil shall be suitably cleaned of soil that could fall off onto the Berman Properties LLC redevelopment at Highland Avenue and Cedar Road, public roadways or create dust. Prior to entering the Cedar Road Easement, a spot check of the commercial vehicle will be performed to ensure no heavy soils are present in the tire tread.




A commercial vehicle decontamination zone is proposed to be set up immediately east of the Berman Property security fence along Cedar Road Easement (refer to the attached map). The minimum required steps in the decontamination procedure (including setup) are outlined below.

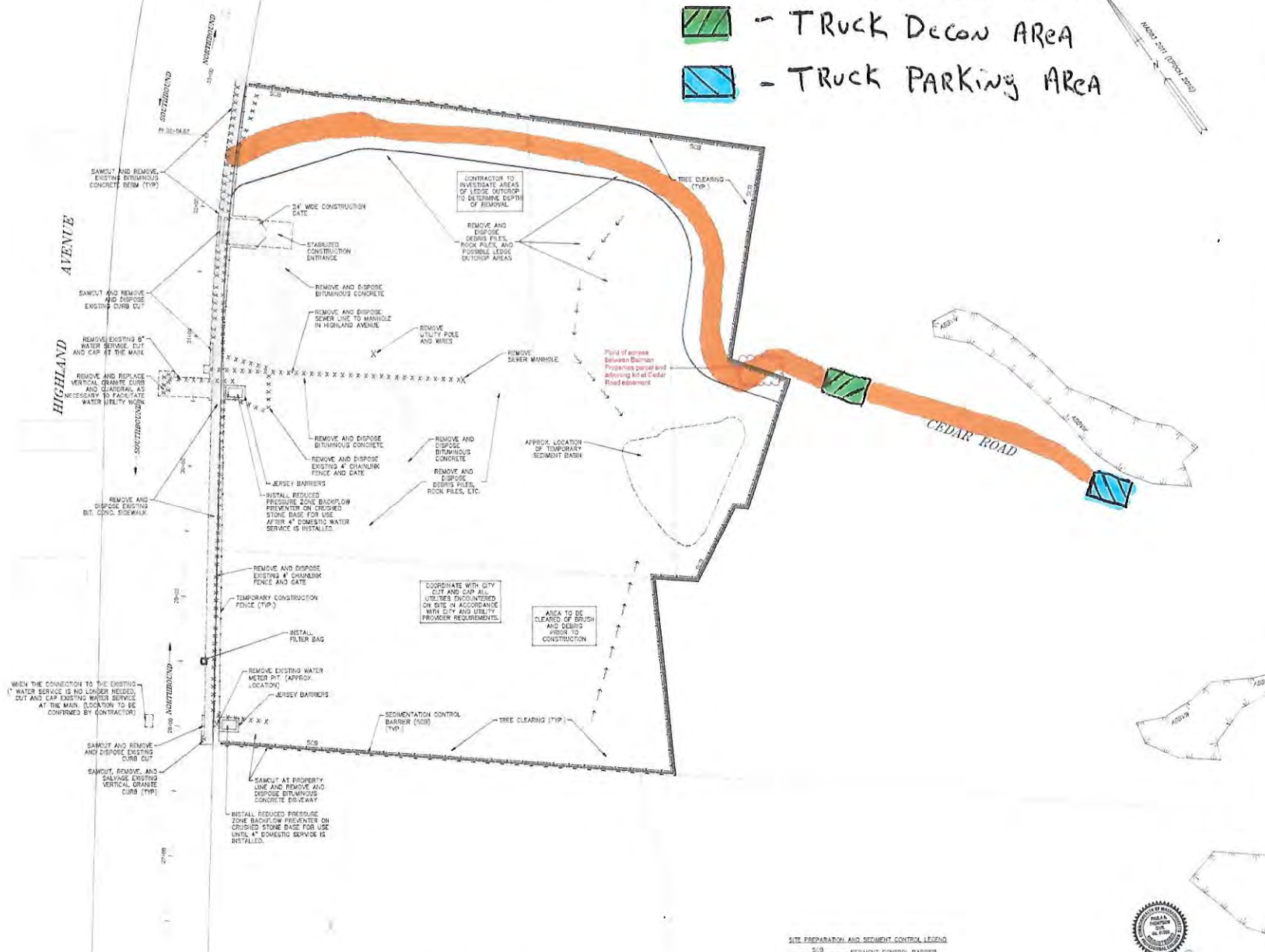
- Lay out plastic sheeting layer at the vehicle decontamination station to prevent contact between the tires and the overlying soils;
- Prepare a detergent solution in one of the buckets;
- Partially fill the second bucket with distilled water;
- Remove heavy soils from vehicle tires with a brush;
- After the heavy soils are removed from the vehicle tires, apply the detergent solution and scrub with the brush;
- Allow detergent solution to drain for a moment prior to immersing the vehicle tires with rinse water;
- Complete a final rinse of the vehicle tires with copious amounts of water from the squirt/wash bottle;
- Allow the water to drain from the vehicle tires and dry wipe with paper towels prior to leaving the vehicle decontamination station; and
- Dispose of paper towels and plastic sheeting material, appropriately.

All personnel in the decontamination zones shall wear the appropriate level of PPE designated for the decontamination process.



# CEDAR ROAD Access Request

-  - TRUCK TRAVEL PATH
-  - TRUCK DECON AREA
-  - TRUCK PARKING AREA



PREPARED FOR:  
**BERMAN PROPERTIES, LLC**  
 200 HIGHLAND AVENUE  
 SALEM, MASSACHUSETTS

RECORDED OWNER:  
**BERMAN PROPERTIES, LLC**  
 40009 415  
 LOT 1 & BELLOCATED CEDAR ROAD  
 PLAN BOOK 40008, PAGE 432

(BACK TITLE SHEET)  
 38097 149  
 IC CERT 88520  
 LOT 303 & 305A  
 IC DOC 88523  
 (WITHDRAWAL FROM LAND COURT)  
 IC DOC 88523

38097 149  
 IC CERT 88521  
 LOT 303 & 305B  
 IC DOC 88523  
 (WITHDRAWAL FROM LAND COURT)  
 IC DOC 88523 (LOT 303)  
 IC DOC 88521 (LOT 307)

34000 003  
 LOT 303 & 305B  
 PARCEL 300A  
 PLAN 40008 405

38097 149  
 IC CERT 88520  
 LOT 304 & 306  
 IC DOC 88523  
 (WITHDRAWAL FROM LAND COURT)  
 IC DOC 88523

38097 149 (LOTS 301 & 302)  
 34000 003 (PARCEL A  
 PLAN No. 88 OF 1843)  
 IC CERT 88529  
 IC DOC 88523  
 (WITHDRAWAL FROM LAND COURT)  
 IC DOC 88523

38097 149  
 IC CERT 88520  
 LOT 303 & 305B  
 IC DOC 88523  
 (WITHDRAWAL FROM LAND COURT)  
 IC DOC 88523  
 LOT 300A  
 PLAN 40008 405

DISPATCHED BY BEALS AND THOMAS, INC. ALL RIGHTS RESERVED

PREPARED BY:  
**BEALS+THOMAS**  
 BEALS AND THOMAS, INC.  
 RESIDENTIAL CONSTRUCTION GROUP  
 144 Turnpike Road  
 Southborough, Massachusetts 01772-2024  
 T: 508.353.5200 www.bealsandthomas.com

1	10/1/2021	REVISED PER MASTROT
2	10/1/2021	FOR CONSTRUCTION DOCUMENTS
3	10/1/2021	REVISED PER MASTROT
4	10/1/2021	REVISED PER MASTROT
5	10/1/2021	REVISED PER MASTROT
6	10/1/2021	REVISED PER MASTROT
7	10/1/2021	REVISED PER MASTROT
8	10/1/2021	REVISED PER MASTROT
9	10/1/2021	REVISED PER MASTROT
10	10/1/2021	REVISED PER MASTROT
11	10/1/2021	REVISED PER MASTROT
12	10/1/2021	REVISED PER MASTROT
13	10/1/2021	REVISED PER MASTROT
14	10/1/2021	REVISED PER MASTROT
15	10/1/2021	REVISED PER MASTROT
16	10/1/2021	REVISED PER MASTROT
17	10/1/2021	REVISED PER MASTROT
18	10/1/2021	REVISED PER MASTROT
19	10/1/2021	REVISED PER MASTROT
20	10/1/2021	REVISED PER MASTROT

PROJECT:  
**HIGHLAND AVE AT CEDAR ROAD DEVELOPMENT**  
 SALEM, MASSACHUSETTS (ESSEX COUNTY)

SCALE: 1" = 30'  
 DATE: AUGUST 17, 2021






**SITE PREPARATION PLAN**

DES: DWN  
 CHK: D  
 APP: D

PROJECT NO: 2005.04  
 PLAN NO: 30006P19K-001

**C2.1**

- SITE PREPARATION AND DEMOLITION NOTES**
- CONTRACTOR TO PROVIDE SEDIMENT TRAPPING PAD AT ALL CONSTRUCTION VEHICLE ENTRANCES
  - TRUCK BASE SHALL BE INSTALLED BY ALL GATOR SIGNS TO REMAIN
  - CONTRACTOR IS RESPONSIBLE TO PROVIDE SEDIMENT BARRIERS WITH A MINIMUM VOLUME OF 3000 GPM PER ACRE OF DISTURBED AREA. CONTRACTOR SHALL INSTALL TEMPORARY FILTER BAGS AND CURBS AS NECESSARY
  - BEFORE INSTALLING EQUIPMENT ON SITE FOR THE START OF WORK, A PRE-CONSTRUCTION CONFERENCE AS NECESSARY SHALL BE CONDUCTED WITH THE CITY PLANNER OR THEIR DELEGATE, THE BUILDING COMMISSIONER, THE HEALTH DEPT. TREE WARDEN AND ANY OTHER AGENCIES THAT MAY BE NECESSARY. THE CONTRACTOR SHALL BRING A CONSTRUCTION SCHEDULE AT THE TIME OF THE PRE-CONSTRUCTION CONFERENCE. THE SCHEDULE SHALL INCLUDE A DESCRIPTION OF HOW CONSTRUCTION WILL BE PHASED AND SIGNED AND WHEN THE IMPACT WILL BE TO THE ADJACENT AND ROADWAYS.

- SITE PREPARATION AND SEDIMENT CONTROL LEGEND**
-  SEDIMENT CONTROL BARRIER
  -  CATCH BASIN RILLT PROTECTION
  -  STABILIZED CONSTRUCTION ENTRANCE
  -  REMOVE
  -  SAWCUT AND REMOVE EXISTING PAVEMENT, PROCESSED PAYMENT FOR RE-USE AS PAVEMENT BEDDING AND SALVAGE EXISTING PAVEMENT FOR RE-USE

FOR NOTES, REFERENCES AND LEGEND SEE SHEET C1.1 AND C1.2

BEALS AND THOMAS, INC. SHALL NOT BE RESPONSIBLE FOR CONSTRUCTION MEANS, METHODS, TECHNIQUES OR PROCEDURES EMPLOYED BY THE CONTRACTOR, NOR FOR THE SAFETY OF PUBLIC OR CONTRACTORS EMPLOYEES, OR FOR THE FAILURE OF THE CONTRACTOR TO CARRY OUT THE WORK IN ACCORDANCE WITH THE CONTRACT DOCUMENTS.

NO PART OF THIS DOCUMENT MAY BE REPRODUCED, EITHER IN A MATERIAL MEDIUM, OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC, MECHANICAL, PHOTOCOPYING, RECORDING OR OTHERWISE WITHOUT THE PRIOR WRITTEN PERMISSION OF BEALS AND THOMAS, INC. COPIES THAT ARE REPRODUCED WITHOUT THE WRITTEN PERMISSION OF BEALS AND THOMAS, INC. SHALL BE CONSIDERED TO BE UNLAWFUL. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS AS REQUIRED IN CONNECTION WITH PERFORMANCE OF SPECIAL BUSINESS UNDER THIS AGREEMENT, AND/OR IN CONNECTION WITH THE DOCUMENT WITHOUT THE WRITTEN PERMISSION OF BEALS AND THOMAS, INC. SHALL BE UNLAWFUL.

## **APPENDIX D**

# Blackstone Environmental Solutions, LLC

---

## Environmental Consulting and Licensed Site Professional Services

Mayor Dominick Pangallo  
City of Salem  
City Hall  
93 Washington Street  
Salem, MA 01970  
Via email to City Solicitor: brennard@salem.com

August 24, 2023  
Project #1843

**RE: Immediate Response Action Notification**

Vacant Parcels  
12 Cedar Road, 14 Cedar Road, and 14 Barnes Road  
Salem, MA 01970  
RTN 3-38273

Dear Mayor Pangallo:

Pursuant to the Massachusetts Contingency Plan (MCP) 310 CMR 40.1403 (3)(b), Blackstone Environmental Solutions LLC (BES) on behalf of JL Realty Trust, JMI Realty Trust, and Barnes Road Trust is providing notice of the implementation of an Immediate Response Action (IRA) undertaken to prevent, control, abate, or eliminate an Imminent Hazard (IH) as required in 310 CMR 40.0322 and 40.0426 at the above referenced properties (i.e., referred herein as the “Site”). A summary of the regulatory notification conditions requiring an IRA at the Site is presented below.

On August 7, 2023, the Massachusetts Department of Environmental Protection (MassDEP) was notified on behalf of JL Realty Trust of the detection of total chromium in a sample that was collected in the top 6 inches of soil material at the vacant property located at 14 Cedar Road, and exhibited a concentration above the notification threshold for the purpose of fulfilling the “Two Hour” release notification obligations of 310 CMR 30.0311(7), as a “Could Pose” Imminent Hazard to human health. The dataset generated as part of an assessment by Chubb Global Risk Advisors on January 31, 2020 includes a total chromium concentration of 258 milligrams per kilogram (mg/kg) that was collected in the top 6 inches of material at location SS-2. SS-2 is located in close proximity to the property boundary for 16 Cedar Road. MassDEP subsequently assigned RTN 3-38273 to this 2-hour reporting condition.

On August 11, 2023, the MassDEP was notified on behalf of Barnes Road Trust that the vacant property located at 14 Barnes Road has triggered a 2-hour reporting condition (i.e., potential Imminent Hazard Condition). The 14 Barnes Road property is located immediately adjacent to 14 Cedar Road. The dataset generated as part of an assessment by Weston & Sampson on October 9, 2020 includes a total polychlorinated biphenyl (PCB) concentration of 118.3 mg/kg that was collected in the top 6 inches of material at location N-9. This PCB concentration is above the notification threshold for the purpose of fulfilling the “Two Hour” release notification obligations of 310 CMR 30.0311(7), as a “Could Pose” Imminent Hazard to human

Blackstone Environmental Solutions, LLC  
76 Bay View Drive Shrewsbury MA 01545  
(508) 612-4738 · www.bes-env.com

health notification threshold.

On August 14, 2023, the MassDEP was notified on behalf of JL Realty Trust that the vacant property located at 12 Cedar Road has triggered a 2-hour reporting condition (i.e., potential Imminent Hazard Condition). The dataset generated as part of that assessment by Weston & Sampson on October 8, 2020 includes a total PCB concentration of 66 mg/kg that was collected in the top 6 inches of material at location F-3. This PCB concentration is above the notification threshold for the purpose of fulfilling the “Two Hour” release notification obligations of 310 CMR 30.0311(7), as a “Could Pose” Imminent Hazard to human health notification threshold. The 12 Cedar Road property is immediately adjacent to 14 Cedar Road.

MassDEP verbally approved IRA activities to be conducted under RTN 3-38273 for 12 Cedar Road, 14 Cedar Road, and 14 Barnes Road, and includes but not limited to an expedited subsurface investigation program to be completed within 60 days to address the potential Imminent Hazard condition to human health at the Site. The assessment activities will be performed to further investigate the source of the shallow heavy metals, including chromium and lead, and PCB impacted soils. Also, MassDEP has approved the installation of a security fence along the southern boundary of 16 Barnes Road in order to restrict access to 14 Barnes Road via a trespasser scenario.

If there are any questions regarding this correspondence, please do not hesitate to contact the undersigned.

Sincerely,  
**Blackstone Environmental Solutions, LLC**



Michael C. Bricher, LSP, P.G.  
Principal

CC: Board of Health, City of Salem, Public Health Agent, Mr. David Greenbaum, RS.  
dgreenbaum@Salem.com  
Kathleen Ingemi, 381 Highland Avenue, Salem, MA 01970  
Jamy Buchanan Madeja, Esq., Buchanan & Associates, 100 Cambridge Street, Suite  
1400, Boston, MA 02114  
Erik Johnson, Bureau of Waste Site Cleanup, Northeast Regional Office, MassDEP