

**REMOVAL PROGRAM
AFTER ACTION REPORT
FOR THE
LEWIS CHEMICAL SITE
HYDE PARK, SUFFOLK COUNTY, MASSACHUSETTS
27 MARCH 2023 THROUGH 22 OCTOBER 2024**

Prepared For:

U.S. Environmental Protection Agency
Region I
Emergency Planning and Response Branch
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912

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Submitted By:

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1.0 INTRODUCTION

The following report, entitled *Removal Program After Action Report for the Lewis Chemical Site, Hyde Park, Suffolk County, Massachusetts, 27 March 2023 through 22 October 2024*, is a chronological summary of the response actions taken by the U.S. Environmental Protection Agency (EPA), Region 1, Emergency Planning and Response Branch (EPRB). The report details the situation as it developed, actions taken, and resources committed.

Site activities included mobilizing Weston Solutions, Inc. (Weston), EPA's Superfund Technical Assessment and Response Team (START) contractor, and Environmental Restoration, LLC (ER), EPA's Emergency and Rapid Response Services (ERRS) contractor, to the Site. START was tasked with conducting daily air monitoring using particulate air monitors; delineating the Exclusion Zone (EZ), the Contamination Reduction Zone (CRZ), and Support Zone (SZ); documenting and photo-documenting site conditions and activities; conducting additional sampling and site characterization as needed to further delineate the extent of contamination; and conducting post-excavation confirmation sampling and field screening, as necessary, to verify that remaining soil meets the site specific clean up goals. ERRS was tasked with clearing of brush and vegetation from the Site; conducting dust control and suppression for worker protection and public health; excavating soil contaminated with polychlorinated biphenyls (PCBs) and other collocated contaminants; removing and disposing of other hazardous substances discovered during this removal action; providing and placing geotextile fabric and warning barrier across excavation areas; developing a traffic management plan for the disposal of hazardous wastes and incoming clean soil; backfilling excavated areas and capping the excavated footprint of the Site; repairing response-related damages; and conducting transportation and disposal (T&D) of contaminated soil to EPA-approved disposal facilities.

2.0 SITE CONDITIONS AND BACKGROUND

2.1 Site Location and Description

The Lewis Chemical Site (the Site) comprises three properties, totaling 0.9 acres, two of which are owned by the City of Boston (the City), and the third of which is owned by the Commonwealth of Massachusetts (the Commonwealth) and managed by the Department of Conservation and Recreation (DCR). The two City of Boston-owned properties are located at Fairmount Court (Property ID: 1810601000) and 12-24 Fairmount Court (Property ID: 1810598000). The Commonwealth-owned property is located at Fairmount Avenue (Property ID: 1810602000). All three properties constituting the Site are located in Hyde Park (Boston), Suffolk County, Massachusetts (MA) (see Appendix A, Figure 1) [1].

The City acquired the Fairmount Court property (Property ID: 1810601000) in 1990 through a tax foreclosure and became owner of the 12-24 Fairmount Court property (Property ID: 1810598000), the larger of the two parcels and the location of former industrial facilities, in 2001, also through a tax foreclosure. The square footage of the two parcels is approximately 30,120 square feet (0.69 acres). The Commonwealth-owned third parcel of the Site is approximately 8,500 square feet and runs along the north bank of the Neponset River.

The Site is located in a densely populated residential/commercial neighborhood, with approximately 20,858 people residing within 1-mile of the Site. The entire Site abuts the Neponset River to the south, with approximately 580 feet of frontage. The elevated Fairmount Massachusetts

Bay Transportation Authority (MBTA) train station and at-grade railroad tracks are adjacent to and located to the north and northwest of the Site, with approximately 520 feet (ft) of common boundary. Fairmount Court dead ends at the northeast entrance of the Site. The approximate center of the Site is located at latitude 42° 15' 10.368" North, and longitude 71° 07' 11.136" West (see Appendix A, Figure 2) [2].

Prior to the EPA removal action, the Site was vacant of buildings or improvements, other than a former foundation slab and retaining wall, and was secured with a chain-link fence. At the time of the initial EPA visit, several openings were observed in the fence bordering the Neponset River, and signs of trespass were observed such as graffiti and empty liquor containers strewn throughout. The Site was wooded with trees and scrub vegetation due to abandonment, was unpaved, and was fairly level, except where it sloped rather steeply down to the Neponset River. The riverbank frontage was reinforced with an armor stone embankment.

2.2 Site History/Previous Actions

Historically, both of the City-owned properties were occupied by several businesses in the late 1800s and early 1900s. The historical uses of the Fairmount Court property included small businesses such as a plumber, tailor, laundry, dressmaker, barber, and residential apartments. The larger parcel located at 12-24 Fairmount Court was occupied by the Royal Remedy Co. Laboratory, a mason and picture painting company, a quilted brush factory, mill stone manufacturing, a carpenter, dental tool manufacturing, a knitting business, and a chemical and dye company. From 1940 until the early 1960s, the Leather Manufacturing Co., Inc. operated on the property. Following leather manufacturing, the Lewis Chemical Corp. operated from 1963 to 1983, collecting, transporting, storing, and processing hazardous wastes. The former Lewis Chemical industrial facility was removed in 2013 by the City. To limit the exposure to the underlying soil/groundwater impacts, the concrete slabs and certain slope-stabilizing retaining walls along the northern and western extent of the building were left intact.

In March 2003, a Phase I Brownfields Site Investigation Report was completed by Environmental Strategies & Management, Inc. (ESM) for the City. The Phase I included a site inspection, and soil, groundwater, sediment, and surface water sampling and analyses, and a ground penetrating radar (GPR) survey. An 8,000-gallon underground storage tank (UST) was identified during the GPR survey. Analytical results from soil samples and groundwater samples indicated that PCBs and volatile organic compounds (VOCs) such as trichloroethylene (TCE) were present above applicable Massachusetts Contingency Plan (MCP) Reportable Concentrations (RCs).

In May 2007, an Interim Phase II – Comprehensive Site Assessment was completed by ESM for the City. The investigation included installing overburden wells and bedrock wells, recording data with piezometers, and collecting soil gas samples, sediment samples, groundwater samples, and water table and potentiometric surface data. Contaminants of concern (COCs) were identified as chlorinated and non-chlorinated VOCs, petroleum hydrocarbons, metals, and PCBs. The report summarized the primary areas of concern which were beneath the building, and between the building and the Neponset River.

In February 2014, a targeted Brownfields Site Assessment report was completed by Nobis Engineering for the City of Boston which detailed field activities conducted in September 2013 and November 2013. Soil samples from 28 soil boring locations were collected and analyzed for

VOCs, PCBs, and metals. PCBs were detected up to 13,000 milligram/kilogram (mg/kg) at 2.5 feet below ground surface (bgs).

In April 2015, a *Final Phase II Comprehensive Site Assessment* was completed by Woodard & Curran (W&C) for the City [3]. The report indicated that metals and VOCs were detected in soil above corresponding MCP S-1 standards. As part of the Phase II study, a Method 3 Human Health Risk (HHR) Characterization was completed. The Method 3 HHR Characterization concluded that impacted soil, groundwater, and Neponset River sediments posed potential significant risks to future users of the Site, and additional response actions were required at the Site to mitigate the potential risks [3].

In January 2018, CDW Consultants (CDW) conducted a Phase II Comprehensive Site Assessment for DCR. Between March 2015 and January 2018, CDW conducted subsurface investigation activities which included advancement of soil borings, and soil and groundwater sampling. Soil and groundwater results indicated that the highest concentrations of VOCs in both soil and groundwater were found near the former building discharge pipes and near the above ground tank pad.

In June 2020, December 2020, and March 2021, CDW conducted additional soil sampling to characterize the extent of PCB contamination at the Site on behalf of DCR. Samples collected by CDW between June 2020 and March 2021 showed that PCBs were detected in 373 of 540 soil samples. A total of 234 of the soil samples contained PCB concentrations above the MCP Method 1, S-1 Standard of 1 mg/kg, and 87 samples contained PCBs at 50 mg/kg or above [6]. The highest PCB concentration was measured in B-16 (0-2') at 15,550 mg/kg.

The City's report from April 2015 revealed that soil on the City-owned parcels was contaminated with PCBs, based on the collection of 334 samples, with PCBs at levels similar to the contamination existing on the Commonwealth-owned parcel. Additionally, reports indicated that soil areas where PCBs were detected were also contaminated with elevated levels of VOCs and metals (see table below). The levels of PCBs, VOCs, and metals were also above Massachusetts Department of Environmental Protection (MassDEP) MCP Standards for S-1 Soil and EPA's Removal Management Levels (RMLs). The highest results are shown below:

Hazardous Substance	City/DCR Highest Sample Concentration	EPA RML	MassDEP MCP Standards for S1-Soil Remediation
PCBs	15,500 mg/kg [DCR 0-2 ft below ground surface (bgs)] 13,000 mg/kg (City at 2.5 ft bgs)	23 mg/kg	1 mg/kg
Tetrachloroethylene	8,000 mg/kg (City) 1,600 mg/kg (DCR)	2,400 mg/kg	1 mg/kg
Trichloroethylene	1,900 mg/kg (City) 3,000 mg/kg (DCR)	94 mg/kg	0.3 mg/kg

Hazardous Substance	City/DCR Highest Sample Concentration	EPA RML	MassDEP MCP Standards for S1-Soil Remediation
METALS (lead)	4,800 mg/kg (City) 710 mg/kg (DCR)	400 mg/kg	200 mg/kg

On 21 June 2022, the City requested EPA’s assistance to address the inorganic and organic contaminants found on the two City-owned parcels [4]. The COCs were most notably PCBs, trichlorethylene (TCE), and tetrachloroethylene (PCE). The COCs were identified based on sampling conducted between 2003 and 2015 and documented in the April 2015 *Final Phase II Comprehensive Site Assessment* by W&C, the City of Boston subcontractor [3].

On 9 November 2022, MassDEP requested EPA’s assistance to evaluate the need for a removal action at the Site [5]. The Commonwealth also submitted a *Draft Toxic Substances Control Act (TSCA) Risk-Based Cleanup Plan* for the excavation, handling, and disposal of PCB-contaminated soils on its parcel of the Site [6].

In October 2022, EPA initiated a Preliminary Assessment/Site Investigation (PA/SI) to evaluate if the COC and other co-located contamination in Site soils posed a risk to public health or the environment.

3.0 **SUMMARY OF FEDERAL RESPONSE ACTIONS**

3.1 **Organization of the Response**

ORGANIZATION OF THE RESPONSE		
Organization	Representatives	Responsibilities
U.S. Environmental Protection Agency (EPA) Emergency Planning and Response Branch (EPRB) 5 Post Office Square, Suite 100 Boston, Massachusetts 02109-3912	Athanasios Hatzopoulos Wing Chau Keith Paciga Emma Dixon	EPA On-Scene Coordinators (OSCs) responsible for the initiation, oversight, and completion of all removal activities. The OSCs coordinated with State and local officials.
Weston Solutions, Inc. (Weston) Superfund Technical Assessment and Response Team (START) 101 Billerica Ave, Bldg. 5, Ste 103 N. Billerica, Massachusetts 01862	Paul Callahan Liam Trainor John Kelly Bonnie Mace Mark Hall Amy Klinger William Mahany	START Site Personnel that provided the OSC with technical assistance, site documentation, site health and safety monitoring, air monitoring, and draft and final report preparation.
Environmental Restoration (ER), LLC Emergency and Rapid Response Services (ERRS) 222 Weymouth Street Rockland, Massachusetts 02370	Rick Ramuglia	Response Manager (RM) for the ERRS contractor that performed removal activities. The RM was responsible for oversight and organization of mobilization, demobilization, and waste removal activities.
Massachusetts Department of Environmental Protection (MassDEP)	Jennifer McWeeney	State representative that provided support for removal activities.

3.2 Mobilization and Site Preparation

The site-specific removal health and safety plan (HASP) was reviewed and signed by all personnel before any work commenced. In addition, emergency telephone numbers and directions to the hospital were posted and work zones were delineated. All activities were performed in appropriate personal protective equipment (PPE) in accordance with the HASP. The HASP was prepared by START personnel as a separate document, entitled *Health and Safety Plan for the Lewis Chemical Site, Hyde Park, Suffolk County, MA* [7]. On 27 March 2023, the mobilization and staging of ERRS equipment was initiated.

Site preparation activities conducted by ERRS personnel consisted of extensive brush clearing, placement of crushed stone in the trailer/support areas, reconfiguration of the perimeter fence and gate, and other activities as described below.

3.3 Chronology of Removal Activities

Week of 27 January 2023

On 26 January 2023, EPA Superfund and Emergency Management Division (SEMD) Director Bryan Olson signed the Action Memorandum approving the proposed removal action.

Week of 13 March 2023

On 16 March 2023, a site walk was conducted with the following personnel:

- Athanasios Hatzopoulos (EPA OSC)
- Stacy Greendlinger (EPA Public Affairs)
- Zanetta Purnell (EPA Public Affairs)
- Paul Callahan (START)
- Liam Trainor (START)
- Rick Ramuglia (ERRS Response Manager)
- Jennifer McWeeney (MassDEP)
- James Smith (City of Boston)
- Rob Burk (Aspen Consulting, neighboring property)

During the site walk, goals, plans, and logistics for the Removal Action were discussed. Preliminary work would include movement/reconfiguration of fence, installation of electrical service, removal of an existing electric utility pole, and placement of Site trailers.

Week of 27 March 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
ERRS Response Manager (RM) – ER LLC	Rick Ramuglia
Crew – ER LLC	1 operator

Equipment on site:

Type	Quantity
Pickup Trucks	2

Activities for the week included:

- Completed DigSafe marking and DigSafe underground utility location notification.
- Viewed the Site and formulated plans for fence relocation and site logistics.

Week of 3 April 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan William Mahany Liam Trainor
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site:

Type	Quantity
Pickup Trucks	2
Mini Excavator	1

Activities for the week included:

- ERRS re-secured the Site by dismantling and repositioning the existing fence and gate to allow better control and access to the Site.
- START established a 20-foot (ft) x 20-ft grid over the northern portion of the Site (the upland area) to establish sampling locations for clearance samples. These samples were collected to verify that the location of the site trailers would be hazard free.
- ERRS conducted exploratory test-pit excavation with a mini-excavator, and START collected samples from 37 locations, from 0 - 2-ft below ground surface (bgs), for VOCs, PCBs, percent (%) solids, and metals analyses.
- START collected samples from the leather-like (pleather) material which was under soil that CDW Consultants (CDW) (DCR's environmental consultant) reported to be contaminated with PCBs. One sample from the pleather area was collected for asbestos analysis [10].
- START conducted air monitoring using a MultiRAE multi-gas detector throughout the sampling due to a very strong organic odor that was emanating from test pits with pleather material. No readings above background were detected [9].
- For the duration of the removal action, START photo-documented site activities (see Appendix B – Photo-documentation Log).

Key dates:

On 4 and 5 April 2023, representatives from Eversource (electricity utility company) were on site to evaluate the electric utility pole at the northeast end of the Site that needed to be

moved/removed. Eversource confirmed that the pole was live, and that the electrical source for the pole traveled underground from Fairmount Place to the east. The power would have to be disconnected prior to the utility pole being removed.

On 6 April 2023, a meeting was held on site with the EPA OSC, START, ERRS, EPA Health and Safety (HSO) Officer, EPA Section Manager, EPA Enforcement Coordinator, MBTA representative, and Keolis (MBTA contractor) representative. Safety concerns related to the abutting MBTA train station and rail service were discussed, including during tree/brush clearing, soil exaction, and waste loadout. Procedures for spotter use during loadout, and installation of pedestrian barriers at the base of the station stairs were agreed upon.

Also on 6 April 2023, START delivered all collected samples, including associated quality control samples, to EPA's Laboratory Services and Applied Science Division (LSASD) New England Regional Laboratory (NERL) for analysis [8].

Week of 10 April 2023

Personnel on site:

ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site:

Type	Quantity
Pickup Trucks	2
Mini Excavator	1
Skid-Steer	1
Porta-Johns	2
Connex Storage Trailer	1

Activities for the week included:

- Began tree cutting and brush clearing across the Site.
- Removed the electrical pole at the northeast end of the Site after Eversource disconnected electricity from the previous week.

Week of 17 April 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site:

Type	Quantity
Pickup Trucks	2
Mini Excavator	1

Type	Quantity
Skid-Steer	1
Porta-Johns	2
Connex Storage Trailer	1
Woodchipper	1

Activities for the week included:

- Continued tree cutting, brush clearing, and wood/brush chipping.
- Installed a pedestrian barrier fence between the MBTA sidewalk and Fairmount Court for safety concerns per earlier discussion with MBTA representatives.
- Repaired potholes and resurfaced Fairmount Court with crushed stone and stone dust.

Week of 24 April 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site:

Type	Quantity
Pickup Trucks	2
Mini Excavator	1
Skid-Steer	1
Porta-Johns	2
Connex Storage Trailer	1
Office Trailers	2
Large 336 Excavator	1

Activities for the week included:

- Continued tree cutting and brush clearing across the Site, including along the bridge abutment and riverbank.
- Received delivery of a large excavator. Plywood sheets were used to protect pavement on Fairmount Place during excavator offloading and movement.
- Conducted exploratory test-pit excavation to up to 12 feet below ground surface (bgs) in the pleather area to determine the extent of contamination. Additional exploratory test pits were excavated near the utility pole and under the concrete slab up to 8 feet bgs. The peat layer was encountered at 8 feet bgs.
- Excavated trenches for office and crew trailer electrical service installation.
- Received, leveled, and secured two office trailers.

Key dates:

On 24 April 2023, ERRS, EPA, and MassDEP representatives met on site to discuss site plans including removal and restoration activities along the riverbank.

On 27 April 2023, a meeting was held with personnel from EPA, ERRS, and DCR, to discuss the riverbank stone removal and restoration. It was agreed that EPA would follow the plan outlined in the Risk-Based Cleanup & Disposal Plan prepared by CDW, DCR's environmental consultant.

Week of 1 May 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site:

Type	Quantity
Pickup Trucks	2
Mini Excavator	1
Skid-Steer	1
Porta-Johns	2
Connex Storage Trailer	1
Office Trailers	2
Large 336 Excavator	1

Activities for the week included:

- Continued tree cutting and brush clearing, including along the bridge abutment and riverbank.
- Reconstructed the roadway and staging area by spreading out geotextile fabric and covering the fabric with 1.5-inch crushed stone to support incoming and outgoing vehicular traffic.
- Constructed and installed a temporary utility pole and electric panel for the Site trailers.

Week of 8 May 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site:

Type	Quantity
Pickup Trucks	2
Skid-Steer	1
Porta-Johns	2
Connex Storage Trailer	1
Office Trailers	2
Large 336 Excavator	1

Activities for the week included:

- Continued tree cutting and brush clearing, including along the riverbank.
- Removed metal and other debris such as large stones from throughout the Site and staged near the northern perimeter fence.
- Relocated the temporary pole and electric panel to facilitate connection to the Site trailers and established electrical service to the trailers.

Key dates:

On 8 May 2024, a prospective tree company subcontractor was on site to assess the trees on the riverbank and the retaining wall near the MBTA railroad that would need to be removed.

Week of 15 May 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site:

Type	Quantity
Pickup Trucks	2
Skid-Steer	1
Porta-Johns	2
Connex Storage Trailer	1
Office Trailers	2
Large 336 Excavator	1

Activities for the week included:

- Continued tree cutting and brush clearing, including along the riverbank.
- Removed chain-link fence along the riverbank, leaving the fence poles in place, and installed orange high-visibility fence using the existing fence posts.
- Continued staging debris from throughout the Site near the northern perimeter fence.

Week of 22 May 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site:

Type	Quantity
Pickup Trucks	2
Skid-Steer	1
Porta-Johns	2
Connex Storage Trailer	1
Office Trailers	2
Large 336 Excavator	1

Activities for the week included:

- Continued tree cutting and brush clearing, including along the riverbank and behind the office trailer.
- Continued collecting/removing debris from throughout the Site and staging it near the northern perimeter fence.
- Conducted test-pit excavations behind the office trailer to a depth of approximately 5 feet bgs; cut granite blocks were encountered, but no additional debris was observed.
- Installed silt fence and erosion control sediment socks along the entire length of the riverbank.
- Obtained a hydrant meter from Boston Water and Sewer Department (BWSD) to access water for dust control. Constructed a platform for the hydrant meter per BWSD diagrams.

Week of 29 May 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	John Kelly
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site:

Type	Quantity
Pickup Trucks	2
Skid-Steer	1
Porta-Johns	2
Connex Storage Trailer	1
Office Trailers	2
Large 336 Excavator	1

Type	Quantity
500-Gallon Water Trailer	1

Activities for the week included:

- Continued tree cutting and brush clearing, including along the riverbank and behind the office trailer.
- Constructed a crushed-stone roadway from the upland area down onto the concrete slab to enable the water trailer and other vehicles to access work zones.
- Began using water for dust suppression.

Key dates:

On 1 June 2023, a representative from Northern Tree Company (subcontracted for tree removal by ERRS) was on site to view the work area. Northern Tree Company would be conducting large tree removal across the Site.

Week of 5 June 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site:

Type	Quantity
Pickup Trucks	2
Skid-Steer	1
Porta-Johns	2
Connex Storage Trailer	1
Office Trailers	2
Large 336 Excavator	1
500-Gallon Water Trailer	1

Activities for the week included:

- Continued tree cutting and brush clearing, including along the riverbank and behind the office trailer.
- Constructed an access road from the staging area to the southwest end of the Site by spreading geotextile fabric and covering the geotextile fabric with crushed stone and stone dust.
- ERRS collected soil samples and pleather material for waste disposal characterization. The samples were picked up by courier and delivered to an ERRS-procured laboratory.
- Eversource completed the electrical inspection of the electrical service wiring to the Site trailers.

Key Dates:

On 5 and 6 June 2023, Northern Tree Company crew were on site for 2 days removing trees along the riverbank and railroad tracks. All departing trucks had their tires cleaned prior to leaving the Site.

Week of 12 June 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos Abdine Ouedraogo
START – Weston	Liam Trainor
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site:

Type	Quantity
Pickup Trucks	2
Skid-Steer	1
Porta-Johns	2
Connex Storage Trailer	1
Office Trailers	2
Large 336 Excavator	1
938 Front end Loader	1
500-Gallon Water Trailer	1

Activities for the week included:

- Continued tree cutting and brush clearing, including along the riverbank and behind the office trailer.
- Received a front-end loader to the Site.
- Excavated 11 exploratory test pits in the pleather area, the concrete slab, and the upland area; and collected soil samples from the test pits for waste disposal characterization. Test pits in the pleather area and concrete slab area were 5 to 6 feet bgs and had strong observed odors and VOCs readings above background on the MultiRAE multi-gas detector [9]. Concrete, asphalt, and granite chunks were found in the test pits near the office trailers, but no odors or obvious signs of contamination were observed.
- Began excavation of the pleather area at the southwest portion of the Site and stockpiled the material at the east end of the concrete slab.
- Conducted dust suppression as an engineering control with copious amounts of water throughout excavation, staging, and loadout of contaminated soil.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- START conducted particulate air monitoring using TSI DustTraks DRX2s and established remote telemetry data recording using the EPA VIPER telemetry system.

Key dates:

On 14 June 2023, a meeting was held on site with EPA, ERRS, START, Boston Fire Department (BFD), and Boston Police Department (BPD) to discuss the truck traffic plan and routes for transporting waste off site and bringing in clean soil. It was agreed that a police detail would be needed at the intersection of Fairmount Court and Fairmount Street during loadout activities.

On 14 June 2023, two representatives from Woodward and Curran (W&C), contractors for the City of Boston, met at the Site with EPA, ERRS, and START. Details and plans for the removal were discussed, and a site walk was conducted.

On 14 June 2023, during test pit excavation across the Site, personnel encountered an 8-inch clay pipe while advancing test pits. The pipe was discovered in the central portion of the Site, between the edge of the former Lewis Chemical building concrete pad (concrete pad) and the riverbank. The clay pipe ran toward the Neponset River and discharged into a bottomless concrete rectangular structure, which was located approximately 10 feet inland from the riverbank (see Appendix B, Photo-documentation Log).

Week of 19 June 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos Abdine Ouedraogo
START – Weston	Paul Callahan Mark Hall
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued excavation of the pleather area at the southwest portion of the Site and stockpiled the material at the east end of the concrete slab.
- Conducted dust suppression with copious amounts of water.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted particulate air monitoring using TSI DustTraks DRX2s with the EPA VIPER telemetry system.

Key dates:

On 20 June 2023, an EPA Community Involvement Coordinator (CIC), a representative from DCR's environmental consultant (CDW), and a MassDEP representative met at the Site with the EPA OSC for an update on site activities.

Week of 26 June 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued excavation of the pleather area at the southwest portion of the Site and stockpiled the material at the east end of the concrete slab. Large amounts of debris, including concrete, scrap metal, tires, and other materials, were encountered and were excavated and segregated from the main (soil) waste stream.
- Conducted dust suppression with copious amounts of water.
- Reduced the volume of the stockpile by compacting the pleather material utilizing the excavator.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted particulate air monitoring using TSI DustTraks DRX2s with the EPA VIPER telemetry system.

Key dates:

On 26 June 2023, AECOM contractors conducting sampling in the Neponset River requested permission to use the Site to access the river. Permission was granted by the EPA OSC; this activity was conducted over the following weeks.

On 27 and 29 June 2023, Eversource was on site connecting electrical line power to the temporary utility pole.

On 28 June 2023, a representative from the City of Boston Buildings and Structures Inspectional Services was on site. The Site was discussed with the EPA OSC and ERRS, including the City's jurisdiction over the Site and possible need for trenching permits.

On 28 June 2023, the EPA HSO conducted a Health and Safety (H&S) audit at the Site.

On 28 June 2023, during excavation along the northern side of the pleather area, a concrete retaining wall for the railroad was discovered. The extent of the wall was unknown, but a large portion of it appeared to extend underground to the east and west.

On 29 June 2023, one representative from W&C met at the Site with the EPA OSC for an update on site activities.

Week of 3 July 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos Keith Paciga
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START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued excavation of the pleather area at the southwest portion of the Site and stockpiled the material at the east end of the concrete slab. Large amounts of steel were encountered; this material was power washed, added to the steel stockpile, and staged on the northern border of the Site to be recycled.
- Conducted dust suppression with copious amounts of water.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted particulate air monitoring using TSI DustTraks DRX2s with the EPA VIPER telemetry system.

Week of 10 July 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos Keith Paciga
START – Weston	Mark Hall
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued excavation of the pleather area at the southwest portion of the Site and stockpiled the material at the east end of the concrete slab.
- Conducted dust suppression with copious amounts of water.
- During excavation, a small amount of potential asbestos-containing material (ACM) mixed with soil and coal was discovered. Excavation ceased in this area, and the area was covered with polyethylene sheeting.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted particulate air monitoring using TSI DustTraks DRX2s with the EPA VIPER telemetry system.

Key dates:

On 10 and 12 July 2023, representatives from multiple Transportation and Disposal (T&D) companies were on site to view the loadout area and determine trucking transportation logistics.

On 11 July 2023, representatives from MBTA and Keolis met with EPA and ERRS to view the concrete retaining wall uncovered during excavation activities along the northern boundary of the pleather area during the week of 26 June 2023. MBTA personnel had no information available regarding the wall or its extent, and no further excavation of the wall would be conducted for the time being.

On 11 July 2023, a MassDEP representative was on site for an update on removal activities.

Week of 17 July 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan Victoria Bettuelli (Sovereign Consulting)
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued excavation of the pleather area at the southwest portion of the Site and stockpiled the material at the east end of the concrete slab.
- Conducted dust suppression with copious amounts of water.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted particulate air monitoring using TSI DustTraks DRX2s.

Key dates:

On 17 July 2023, a representative from Ultra Safe Pest Management (Ultra Safe Pest) met with EPA and ERRS to discuss placement of rodent traps. Residents across the river had complained about rat presence in their yards. The exterminator deployed 18 rodent traps throughout the Site.

On 17 July 2023, two MassDEP representatives were on site to discuss removal progress and the small amount of recently discovered ACM.

On 17 July 2023, the EPA OSC and ERRS RM met with a representative of Aspen Consulting, an adjacent property owner, to discuss modifications to the facility gate and fence to allow for truck access during loadout.

Week of 24 July 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Victoria Bettuelli (Sovereign Consulting)

ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer 2 additional staff for 2 days for fence work.

Equipment on site: Same as previous week.

Activities for the week included:

- Modified the gate and fence of the adjacent Aspen Consulting property to facilitate loadout activities.
- Continued excavation of the pleather area at the southwest portion of the Site and stockpiled the material at the east end of the concrete slab.
- Conducted dust suppression with copious amounts of water.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted particulate air monitoring using TSI DustTraks DRX2s.

Key dates:

On 27 July 2023, a CDW representative met at the Site with the EPA OSC for an update on site activities.

On 27 July 2023, an MBTA engineer was on site to view the concrete retaining wall along the northern pleather area, and to discuss cautions and procedures for any additional work above the wall.

Week of 31 July 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos Keith Paciga
START – Weston	Victoria Bettuelli (Sovereign Consulting)
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Prepared documentation of the proposed truck traffic route and drafted a Truck Traffic Plan.
- Continued excavation of the pleather area at the southwest portion of the Site and stockpiled the material at the east end of the concrete slab.
- Conducted dust suppression with copious amounts of water.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted particulate air monitoring using TSI DustTraks DRX2s.

Key dates:

On 3 August 2023, a representative from Grant Steel was on site to discuss recycling of all metal scrap collected at the Site.

Week of 7 August 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Victoria Bettuelli (Sovereign Consulting)
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued excavation of the pleather area at the southwest portion of the Site and stockpiled the material at the east end of the concrete slab.
- Conducted dust suppression with copious amounts of water.
- Dismantled additional chain-link fence along the river and added scrap metal to the stockpile.
- Modified the Aspen Consulting fence gate to facilitate loadout activities.
- Collected and washed metal debris in a roll-off container. (Funding will be credited back to the Site removal funds.)
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- START conducted particulate air monitoring using TSI DustTraks DRX2s.

Key dates:

On 8 August 2023, Grant Steel collected the roll-off container of cleaned scrap metal for recycling. Funding will be credited back to the Site removal funds.

On 9 August 2023, EPA PCB program representatives and MassDEP representative were on site to discuss removal progress, plans, and PCB removal action levels.

Week of 14 August 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos Keith Paciga
START – Weston	Victoria Bettuelli (Sovereign Consulting)
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued excavation of the pleather area at the southwest portion of the Site and stockpiled the material at the east end of the concrete slab.
- Reduced the volume of the stockpile by compacting the pleather material utilizing the excavator.
- Conducted dust suppression with copious amounts of water.
- Repaired and re-installed silt fence along the riverbank.
- Modified the Aspen Consulting fence gate to facilitate loadout activities.
- Conducted brush clearing along the riverbank and the northern fence line.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted particulate air monitoring using TSI DustTraks DRX2s.

Week of 21 August 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos Keith Paciga
START – Weston	Victoria Bettuelli (Sovereign Consulting)
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Reduced the volume of the stockpile by compacting the pleather material utilizing the excavator to prepare for loadout.
- Conducted dust suppression with copious amounts of water.
- Received loads of 1.5-inch and 0.75-inch stone gravel.
- Spread additional gravel on top of geotextile fabric in the support zone to facilitate parking and loadout activities.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted particulate air monitoring using TSI DustTraks DRX2s.

Key dates:

On 23 August 2023, five members of the EPA Headquarters Office of Civil Rights (OCR) visited the Site. EPA OSC, SEMD representative, and CIC met with OCR staff. EPA OSC gave a brief history of the Site and a thorough update of the ongoing removal action, as well as a discussion about the Riverside Square PCB Site.

Week of 28 August 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos Keith Paciga
START – Weston	Victoria Bettuelli (Sovereign Consulting)
ERRS RM – ER LLC	Rick Ramuglia Josue Santos
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Began loadout of stockpiled pleather material waste.
- Conducted dust suppression with copious amounts of water.
- Opened the gate at Aspen Consulting at the beginning of each day. The gate was secured at the end of each day.
- Excavated additional pleather material from along the riverbank and added to the stockpile.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted particulate air monitoring using TSI DustTraks DRX2s.

Key dates:

Between 28 and 31 August 2023, a total of 22 trucks were loaded with pleather material waste for transport to the disposal facility. Material was transported by W.L. French Excavating Corporation to the Casella NEWSVT Landfill in Coventry, Vermont (VT) (see Appendix D, Waste Disposal Summary Table).

Throughout T&D activities, on days when load out of waste material was to occur, the gate at Aspen Consulting was opened at the beginning of the day to allow for trucks to pull onto that property and back into the Site per prior agreement with the property owner. The gate was secured at the end of each day.

In addition, throughout T&D activities, disposal trucks were not allowed to leave the Site within a 15-minute window of an eastbound MBTA train to minimize impediment of pedestrian and vehicle traffic at the Fairmont platform. A Police detail was requested but not provided. After loading, trucks were escorted out Fairmount Court onto Fairmount Avenue by ERRS staff.

On 31 August 2023, a representative from CDW met with the EPA OSC for an update on site activities.

Week of 4 September 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
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START – Weston	Victoria Bettuelli (Sovereign Consulting)
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued loadout of stockpiled pleather material. Landfill restrictions limited the number of trucks able to offload on any given day.
- Conducted dust suppression with copious amounts of water.
- Opened the gate at Aspen Consulting at the beginning of each day. The gate was secured at the end of each day.
- Excavated additional pleather material from along the riverbank and added it to the stockpile.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted particulate air monitoring using TSI DustTraks DRX2s.

Key Dates:

Between 5 and 8 September 2023, a total of 12 trucks were loaded with pleather material waste for transport to the disposal facility.

Throughout T&D activities, on days when load out of waste material was to occur, the gate at Aspen Consulting was opened at the beginning of the day to allow for trucks to pull onto that property and back into the Site per prior agreement with the property owner. The gate was secured at the end of each day.

In addition, throughout T&D activities, disposal trucks were not allowed to leave the Site within a 15-minute window of an eastbound MBTA train to minimize impediment of pedestrian and vehicle traffic at the Fairmont platform. A Police detail was requested but not provided. After loading, trucks were escorted out Fairmount Court onto Fairmount Avenue by ERRS staff.

Week of 11 September 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Victoria Bettuelli (Sovereign Consulting)
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Completed loadout of stockpiled pleather material.
- Conducted dust suppression with copious amounts of water.
- Opened the gate at Aspen Consulting at the beginning of each day. The gate was secured at the end of each day.
- Installed an additional 180 feet of silt fence along the riverbank at the southwest portion of the Site where the pleather material was excavated.
- Washed tree stumps that were pulled from the pleather area to remove any remaining soil and stockpiled them.
- Consolidated any remaining pleather and associated soil into one location at the east end of the concrete pad.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted particulate air monitoring using TSI DustTraks DRX2s.

Key Dates:

Between 11 and 13 September 2023, a total of five trucks were loaded with pleather material waste for transport to the disposal facility.

Throughout T&D activities, on days when load out of waste material was to occur, the gate at Aspen Consulting was opened at the beginning of the day to allow for trucks to pull onto that property and back into the Site per prior agreement with the property owner. The gate was secured at the end of each day.

In addition, throughout T&D activities, disposal trucks were not allowed to leave the Site within a 15-minute window of an eastbound MBTA train to minimize impediment of pedestrian and vehicle traffic at the Fairmont platform. A Police detail was requested but not provided. After loading, trucks were escorted out Fairmount Court onto Fairmount Avenue by ERRS staff.

Week of 18 September 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos Keith Paciga
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site:

Type	Quantity
Pickup Trucks	2
Skid-Steer	1
Porta-Johns	2
Connex Storage Trailer	1
Office Trailers	2
Large 336 Excavator	1

Type	Quantity
938 Front end Loader	1
500-Gallon Water Trailer	1
Excavator with Breaker Attachment	1

Activities for the week included:

- Repaired the gate at Aspen Consulting after it was reported to not be functioning correctly.
- Measured the retaining wall to the north between the pleather area and the MBTA tracks and determined it to be 6 feet high.
- Graded the material on top of the retaining wall to approximately 3 feet high and shared documentation of the re-graded wall to the MBTA.
- Began breaking up of the west end of the concrete pad with a Cat 520 with a hammer attachment. The pad was approximately 10 inches thick in most places, with thicker footer areas and steel reinforcing bars (steel rebar). Steel rebar was removed and stockpiled to be recycled. The concrete pad was broken up to a size of 6-inch or less and stockpiled to be laboratory tested and used as backfill during site restoration.
- Conducted dust suppression with copious amounts of water.
- Washed tree stumps that were pulled from the pleather area to remove any remaining soil and stockpiled them.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using TSI DustTraks DRX2s and a MultiRAE.

Key dates:

On 20 September 2023, Ultra Safe Pest was on site to investigate rodent traps. No animal presence was noted.

On 21 September 2023, personnel observed a strong chemical-like odor during breaking of the concrete pad in the central area of the concrete pad. The area was sprayed with water and covered with polyethylene sheeting to suppress the VOC odors pending determination of modifications to work and safety procedures.

Week of 25 September 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos Keith Paciga
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued breaking up the concrete pad, using the excavator with the hammer attachment, and separating steel rebar.
- Stockpiled concrete after breaking it up.
- Conducted dust suppression with copious amounts of water.
- Screened broken concrete with a MultiRAE; no VOC levels above background or odors were noted.
- Removed boulders and armor stones along the riverbank to facilitate soil sampling.
- Collected samples from the riverbank for PCB, VOC, and metals analyses.
- Replaced boulders and large stones back on the riverbank after sampling was completed.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using TSI DustTraks DRX2s and a MultiRAE.

Key dates:

On 27 September 2023, a representative from MassDEP was on site to view sampling activities and to discuss removal progress.

On 27 September 2023, START collected surface soil samples BK-01 through BK-19 at 0 to 3 inches bgs from the riverbank. The samples were collected 2 to 3 ft from the top of the riverbank to determine the extent of contamination. Samples were submitted to LSASD NERL for PCB, VOC, and metals analyses.

Week of 2 October 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia Josue Vega
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued breaking up and stockpiling the concrete pad, using the excavator with the hammer attachment, and separating steel rebar.
- Conducted dust suppression with copious amounts of water.
- Received a 40-cubic-yard (CY) roll-off container to the Site to recycle the steel rebar.
- Excavated a test pit in the area where the concrete pad was broken up and odors were noticed. Air monitoring was conducted with a MultiRAE and VOCs were detected below the Action Level outlined in the HASP. The peat layer was encountered at approximately 5 feet bgs.
- Removed and stockpiled additional soil and material from the pleather area and above the retaining wall near the MBTA fence.

- Removed and stockpiled several tree stumps.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using TSI DustTraks DRX2s and a MultiRAE.

Week of 9 October 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site:

Type	Quantity
Pickup Trucks	2
Skid-Steer	1
Large Excavator	1
Large Excavator with Hammer attachment	1
Front End Loader	1
Trailer-Mounted Compressor	1
Pneumatic Pump and Hoses	1
Porta-Johns	2
Connex Storage Trailer	1
Office Trailers	2
500-Gallon Water Trailer	1

Activities for the week included:

- Continued breaking up and stockpiling the concrete pad, using the excavator with the hammer attachment, and separating steel rebar.
- Conducted dust suppression with copious amounts of water.
- Removed and stockpiled additional soil and material from the pleather area and above the retaining wall near the MBTA fence. Placed boulders above the retaining wall along the fence line to reinforce fence posts.
- Received, set up, and operated an odor-suppressant foam system from Atmos Technologies under test conditions. The Atmos Technologies AC-645 foam was then drained as practice for use under colder conditions.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks and AreaRAEs

Key Dates:

On 11 October 2023, START personnel began deploying AreaRAE multigas instruments in addition to the DustTraks. Air monitoring data was downloaded daily from the instruments. Odors were noticed during excavation. Air monitoring indicated no VOC levels above Action Levels outlined in the HASP.

Week of 16 October 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued breaking up and stockpiling the concrete pad, using the excavator with the hammer attachment, and separating steel rebar.
- Conducted dust suppression with copious amounts of water.
- Began excavation where the concrete pad had been broken up and removed.
- Conducted excavation to an initial depth of 3 feet bgs where elevated levels of PCBs, metals, and VOCs had been previously identified.
- Stockpiled excavated soil at the east end of the foundation pad.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks and AreaRAEs.

Key dates:

On 18 October 2023, results were received from LSASD NERL for samples collected along the riverbank. PCB levels as high as 22,000 mg/kg were detected at sample location BK-10. The highest PCB levels coincided with State and City PCB data from previous sampling.

On 19 October 2023, personnel discovered a BWSO manhole cover on the northern earthen road in the area where the original loading dock was located during excavation beneath the removed concrete pad. Underneath the cover, an 8-inch waterline with a gate valve at the end was observed. It was unknown if this waterline had been capped by the building demolition contractor.

On 19 October 2023, representatives from MassDEP and CDW were on site to view site activities and discuss removal progress.

Week of 23 October 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos Keith Paciga
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators

	1 laborer
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Equipment on site: Same as previous week.

Activities for the week included:

- Continued excavation to an initial depth of 3 feet bgs where the concrete pad had been broken up and removed.
- Conducted dust suppression with copious amounts of water.
- Conducted odor suppression with AC-645 foam. Foam was used both when the soil was excavated and when it was moved to the soil stockpile.
- Consolidated and compressed the soil stockpile to allow for additional soil stockpiling.
- ERRS collected samples from the soil stockpile for waste disposal characterization.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.
- Conducted air monitoring with a MultiRAE in the working zone. VOC levels were detected in the working zone above the HASP Action Levels. The ERRS crew upgraded to Level C personal protective equipment (PPE) for work in this area. There were no VOC levels above background on AreaRAEs monitoring the perimeter of the Site.

Key dates:

On 26 October 2023, a CDW representative was on site to view and discuss removal progress.

Week of 30 October 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued breaking up and stockpiling the concrete pad, using the excavator with the hammer attachment, and separating steel rebar.
- Continued excavation to an initial depth of 3 feet bgs where the concrete pad had been broken up and removed.
- Conducted dust suppression with copious amounts of water.
- Conducted odor-suppression with AC-645 foam. Foam was used both when the soil was excavated and when it was moved to the soil stockpile.
- Graded and leveled the pleather area at the southwest end of the Site prior to sampling.
- Collected soil samples from the pleather area, above the retaining wall, and from the excavated area.

- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE. Air monitoring indicated no VOC levels above Action Levels outlined in the HASP.

Key Dates:

On 1 through 3 November 2023, START collected 20 soil samples (including one duplicate) from the pleather area (8-10 feet bgs) and above the retaining wall (3-4 feet bgs) for PCB analysis. An additional eight soil samples (including one duplicate) were collected from the excavated area (3 feet bgs) at the center of the Site (central area) for PCB, VOC, and metals analyses. All samples were submitted to LSASD NERL for analysis.

Week of 6 November 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos Keith Paciga
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued breaking up and stockpiling the concrete pad, using the excavator with the hammer attachment, and separating steel rebar.
- Continued excavation where the concrete pad had been broken up and removed.
- Conducted dust suppression with copious amounts of water.
- Conducted odor suppression with AC-645 foam. Foam was used both when the soil was excavated and when it was moved to the soil stockpile.
- Graded and improved truck turnaround area.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE. Air monitoring indicated no VOC levels above Action Levels outlined in the HASP.

Key dates:

On 8 November 2023, representatives from MassDEP and CDW were on site for an update on removal progress.

Week of 13 November 2023

Personnel on site:

OSC – EPA	Keith Paciga
START – Weston	Paul Callahan

ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued breaking up and stockpiling the concrete pad, using the excavator with the hammer attachment, and separating steel rebar.
- Continued excavation where the concrete pad had been broken up and removed.
- Excavated and removed the 8-inch clay pipe that was discovered during test pitting activities the week of 12 June 2023 between the edge of the concrete pad and the riverbank (see Appendix B, Photo-documentation Log). Discovered and removed additional clay pipe fragments and drainage plumbing throughout excavation underneath the concrete pad and the riverbank area.
- Conducted dust suppression with copious amounts of water.
- Conducted odor suppression with AC-645 foam. Foam was used both when the soil was excavated and when it was moved to the soil stockpile.
- Encountered and removed a large concrete block approximately 5 ft by 3 ft by 3 ft during excavation. The block was broken up and added to the concrete stockpile.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Key dates:

On 15 November 2023, the soil sample results from the pleather area and the central area were received. Sample location PI-90A and four sample locations in the central area had PCB results above 50 mg/kg and would require additional excavation.

Week of 20 November 2023

Personnel on site:

OSC – EPA	Keith Paciga
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued breaking up and stockpiling the concrete pad, using the excavator with the hammer attachment, and separating steel rebar.
- Continued excavation to an initial depth of 3 ft bgs where the concrete pad had been broken up and removed.

- Conducted dust suppression with copious amounts of water.
- Conducted odor suppression with AC-645 foam. Foam was used both when the soil was excavated and when it was moved to the soil stockpile.
- Encountered and excavated additional large concrete blocks which were broken up and added to the concrete stockpile.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.
- The rodent control company was on site and reported one field mouse and no rats in any of the baited traps deployed.

Week of 27 November 2023

Personnel on site:

OSC – EPA	Keith Paciga
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued breaking up the concrete pad, using the excavator with the hammer attachment, and separating steel rebar.
- Stockpiled concrete after breaking it up.
- Conducted dust suppression with copious amounts of water.
- Encountered and excavated additional large concrete blocks which were broken up and added to the concrete stockpile.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Key Dates:

On 29 November 2023, personnel encountered an additional 8-inch clay pipe under the concrete pad during excavation in the central area. The pipe ran parallel to the Neponset River.

Week of 4 December 2023

Personnel on site:

OSC – EPA	Keith Paciga
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued breaking up and stockpiling the concrete pad, using the excavator with the hammer attachment, and separating steel rebar.
- Encountered and removed an additional large concrete block beneath the concrete pad that was approximately 7 ft by 4 ft by 4 ft.
- Conducted dust suppression with copious amounts of water.
- Installed an erosion control sediment sock along the south side of the upland road along the northern portion of the site.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Key Dates:

On 6 December 2023, personnel encountered an additional 8-inch clay pipe underneath the concrete pad during excavation. This was the second pipe discovered running parallel to the Neponset River

Week of 11 December 2023

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos Keith Paciga
START – Weston	Paul Callahan William Mahany
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued breaking up the concrete pad, using the excavator with the hammer attachment, and separating steel rebar.
- Stockpiled concrete after breaking it up.
- Encountered and removed an additional large concrete block beneath the concrete pad that was approximately 8 ft by 4 ft by 4 ft.
- Conducted dust suppression with copious amounts of water.
- Conducted odor suppression with the AC-645 foam. Foam was used both when the soil was excavated and when it was moved to the soil stockpile.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Week of 18 December 2023

Personnel on site:

OSC – EPA	Keith Paciga
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued breaking up and stockpiling the concrete pad, using the excavator with the hammer attachment, and separating steel rebar.
- Conducted dust suppression with copious amounts of water.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- ERRS collected waste disposal characterization samples from the contaminated soil stockpile for disposal analysis at Pace Analytical Laboratory.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Week of 1 January 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Conducted site inspection after holiday shutdown. No significant impacts from the Site shutdown and weather events were noted. Water was pooled in the excavation area.
- Consolidated contaminated soil stockpile at east end of concrete pad to enable additional breaking of up of concrete.
- Continued breaking up and stockpiling the concrete pad, using the excavator with the hammer attachment, and separating steel rebar.
- Conducted dust suppression with copious amounts of water.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Week of 8 January 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos Keith Paciga
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued breaking up and stockpiling the concrete pad, using the excavator with the hammer attachment, and separating steel rebar.
- Conducted dust suppression with copious amounts of water.
- Received delivery of a load of stone dust that was spread out to improve footing for scissor lifts to be used during loadout.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Key dates:

On 8 January 2024, MassDEP representative was on site for an update on removal activities.

On 9 January 2024, BWSD representatives were on site to inspect the 6-inch water line and gate valve in the upland area of the Site. They reported not knowing anything about the water line and would send another crew out to investigate further.

On 11 January 2024, during excavation at the northern portion of the concrete pad, an additional large concrete block was encountered approximately 45 feet from the riverbank. The block had oil-like staining, was approximately 8 ft by 7 ft by 5 ft, and had attached broken, deteriorated pipes and a large metal piston-type device sticking out of it (see Appendix B - Photo-documentation Log).

Week of 15 January 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued breaking up and stockpiling the concrete pad, using the excavator with the hammer attachment, and separating steel rebar.
- Removed the steel rebar from the large concrete block with the large metal piston-type device sticking out of it from the previous week.
- Broke up stained concrete from the large concrete block and added it to the contaminated soil stockpile.
- Removed and staged a steel riveted box approximately 3 ft by 2 ft that was imbedded into the large concrete block along with the piston.
- Conducted dust suppression with copious amounts of water.
- Graded the pile and upper loading areas to prepare for loadout.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Week of 22 January 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site:

Type	Quantity
Pickup Trucks	2
Skid-Steer	1
Porta-Johns	2
Connex Storage Trailer	1
Office Trailers	2
Large 336 Excavator	1
938 Front end Loader	1
500-Gallon Water Trailer	1
Excavator with Breaker Attachment	1
Scissor Lift	2

Activities for the week included:

- Began transportation and disposal (T&D) of PCB-contaminated soil.
- Combined contaminated soil from the secondary contaminated soil stockpile with the primary stockpile.
- Continued breaking up and stockpiling the concrete pad, using the excavator with the hammer attachment, and separating steel rebar.
- Conducted dust suppression with copious amounts of water.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Key dates:

On 23 January 2024, Goulet Trucking representative was on site to view and document proper loading and transport procedures.

Between 23 and 25 January 2024, a total of 23 trucks were loaded with PCB-contaminated soil for transport off site. All T&D was performed following the Lewis Chemical traffic plan. Loadout utilized both intermodal containers and dump trailers for PCB-contaminated soil. Trucks would pull down Fairmount Court and pull into the adjacent (Aspen Consulting) property, reverse/back into the Site, then turn around on site prior to loading. All containers and trailers were placarded prior to departure. The intermodal containers were lined with polyethylene sheeting prior to arrival, with the top cover tarp sealed by ERRS after loading was completed, prior to departure. When loading, placarding, tarp securing, and manifest signature was completed, the truck would then back out of the Site and down to the adjacent property, then pull forward up the hill to Fairmount Avenue. ERRS crew members and a police detail (when available) would facilitate truck entry and exit. Transportation of trailers and containers was conducted by Goulet Trucking. Loads were transported to Nashua, New Hampshire (NH) for rail transport to Heritage Environmental Services (Heritage Environmental) of Roachdale, Indiana (IN).

Week of 29 January 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site: Same as previous week.

Activities for the week included:

- Continued T&D of PCB-contaminated soil.
- Continued breaking up and stockpiling the concrete pad, using the excavator with the hammer attachment, and separating steel rebar.
- Conducted dust suppression with copious amounts of water.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Key dates:

On 30 January 2024, representatives from MassDEP and CDW were on site for an update on removal progress.

Between 29 and 31 January 2024, a total of 25 trucks were loaded with PCB-contaminated soil for transport off site. All T&D was performed following the Lewis Chemical traffic plan. All

trucks transported waste materials/soil from site, using the same ingress, egress, and loading procedure as the previous week. Transportation of trailers and containers was conducted by Goulet Trucking. Loads were transported to Nashua, NH for rail transport to Heritage Environmental of Roachdale, IN.

Week of 5 February 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site:

Type	Quantity
Pickup Trucks	2
Skid-Steer	1
Porta-Johns	2
Connex Storage Trailer	1
Office Trailers	2
Large 336 Excavator	1
938 Front end Loader	1
500-Gallon Water Trailer	1
Excavator with Breaker Attachment	1

Activities for the week included:

- Continued excavation in the central part of the Site where concrete pad had been removed. Excavation was advanced to 4 feet bgs. A berm was left on the eastern side of the central area to keep water from entering the new excavation area.
- Encountered and removed additional large concrete blocks, as well as bricks and metal.
- Continued breaking up and stockpiling the concrete pad, using the excavator with the hammer attachment, and separating steel rebar.
- Conducted dust suppression with copious amounts of water.
- Excavated a series of exploratory test pits to approximately 6 feet bgs, where a peat layer was encountered. The soil at 6 feet bgs had a strong organic odor unlike the PCE/TCE odor from contaminated soils. Water began infiltrating into test pits approximately 2 feet from the bottom.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Key dates:

On 5 February 2024, representatives from BWSD were on site to inspect the 6-inch waterline and gate valve in the north central area of the Site.

Week of 12 February 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site:

Type	Quantity
Pickup Trucks	2
Skid-Steer	1
Porta-Johns	2
Connex Storage Trailer	1
Office Trailers	2
Large 336 Excavator	1
938 Front end Loader	1
500-Gallon Water Trailer	1

Activities for the week included:

- Continued excavation in the central part of the Site, including along the granite stone retaining wall, where the concrete pad had been removed. Excavation was advanced to 4 feet bgs. A berm was left on the eastern side of the central area to keep water from entering the new excavation area.
- Excavated two exploratory test pits to a depth of approximately 6 feet bgs, from the berm to the jog in the rock retaining wall. The excavation went down to the peat layer; deeper soils had no odor or elevated VOC levels. Soil in the upper portion of the test pits had elevated VOC levels.
- Collected surface soil samples from the upland road for PCB analysis.
- Conducted dust suppression with copious amounts of water.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Key dates:

On 12 February 2024, START established a sampling grid (15-ft x 15-ft or 15-ft x 10-ft, depending on road width) along the upland road. START then collected a total of 17 surface soil samples (including one duplicate). Samples were submitted to LSASD NERL for PCB analysis.

Week of 19 February 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan

ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued T&D of PCB-contaminated soil.
- Graded the central area for post-excavation sampling.
- Collected samples of the broken concrete for PCB analysis.
- Collected post-excavation samples for PCB, VOC, and metal analyses.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Key Dates:

On 21 February 2024, START and ERRS personnel collected samples of the broken-up concrete and submitted all samples to LSASD NERL for PCB analysis. These samples were collected to determine if the broken up concrete would be used as backfill material.

Also on 21 February 2024, START established a grid (25-foot x 15-foot) in the central area to delineate post-excavation sample locations. A total of 21 post-excavation samples (EXC-10 through EXC-30), plus two duplicates, were collected and submitted to LSASD NERL for PCB, VOC, and metal analyses.

Between 19 and 23 February 2024, a total of 18 trucks were loaded with PCB-contaminated soil for transport off site. All T&D was performed following the Lewis Chemical traffic plan. All trucks transported waste materials/soil from site, using the same ingress, egress, and loading procedure as the week of 22 January 2024. Transportation of trailers and containers was conducted by Goulet Trucking. Loads were transported to Nashua, NH for rail transport to Heritage Environmental of Roachdale, IN.

Week of 26 February 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued T&D of PCB-contaminated soil.

- Began excavation on the riverbank. Removed the top row of armor stones, and excavated approximately 1 foot of soil from underneath the stones.
- Stockpiled the armor stones, and excavated soil into the stockpile.
- Re-installed an erosion control sediment sock and high-visibility fence along the riverbank after excavation was completed.
- Conducted dust suppression with copious amounts of water.
- Discovered two automotive batteries along the riverbank and staged for future disposal.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Key dates:

On 27 February 2024, a representative from MassDEP was on site for an update on removal activities.

Between 26 and 29 February 2024, a total of nine trucks were loaded with PCB-contaminated soil for transport off site. All T&D was performed following the Lewis Chemical traffic plan. All trucks transported waste materials/soil from site, using the same ingress, egress, and loading procedure as the week of 22 January 2024. Transportation of trailers and containers was conducted by Goulet Trucking. Loads were transported to Nashua, NH for rail transport to Heritage Environmental of Roachdale, IN.

Week of 4 March 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan Bonnie Mace
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site:

Type	Quantity
Pickup Trucks	2
Skid-Steer	1
Large Excavator	1
Large Excavator with Hammer attachment	1
Front End Loader	1
Trailer-Mounted Compressor	1
Pneumatic Pump and Hoses	1
Porta-Johns	2
Handwash station	1
Connex Storage Trailer	1
Office Trailers	2
500-Gallon Water Trailer	1
Lasar and Rod	1

Activities for the week included:

- Continued excavation of the riverbank and removing armor stones.
- Conducted dust suppression with copious amounts of water.
- Removed and staged tree stumps as they were encountered during excavation.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Week of 11 March 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued excavation of the riverbank and removing armor stones, working from the south end of the Site to the north end. Additional pleather material was encountered during excavation and was removed and added to the stockpile.
- Conducted dust suppression with copious amounts of water.
- Compacted the stockpile to reduce the volume to prepare for the addition of more material and for loadout.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Key dates:

On 12 March 2024, results from the earlier concrete sampling conducted on 21 February 2024 were received from LSASD NERL. Results indicated no PCBs were present in concrete above the MCP Method 1, S-1 Standard of 1 mg/kg.

Week of 18 March 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued excavation of the riverbank and removing armor stones, working from the south end of the Site to the north end. The armor stones were stockpiled in a separate area to be used for re-construction of the riverbank after excavation was complete.
- Conducted dust suppression with copious amounts of water.
- Removed all visible debris from the riverbank shoreline and placed in a separate stockpile.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Key dates:

On 18 March 2024, a CDW representative was on site to observe site progress.

On 21 March 2024, results of the post-excavation samples collected from the central area excavation on 21 February 2024 were received from LSASD NERL. Results indicated PCB concentrations above 50 mg/kg, indicating that further excavation may be required.

Week of 25 March 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued excavation of the riverbank and removing armor stones, working from the south end of the Site to the north end.
- Conducted dust suppression with copious amounts of water.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Key dates:

On 26 March 2024, two representatives from DCR were on site for a site walk and to observe site activities and discuss planned work.

Week of 1 April 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan

	Amy Klinger
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Continued excavation of the riverbank and removing armor stones, working from the south end of the Site to the north end.
- Conducted dust suppression with copious amounts of water.
- Power washed tree stumps and staged them near the stockpile for disposal.
- Removed remaining fence posts from the riverbank to allow for additional excavation.
- ERRS collected soil samples for waste disposal characterization.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Key dates:

On 2 April 2024, representatives from MassDEP and CDW were on site for progress updates.

Week of 8 April 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	John Kelly Amy Klinger
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Removed the remaining fence and fence posts on the upland road near the retaining wall and replaced with high visibility fence. Placed an erosion control sediment sock along the temporary fence line.
- Excavated the upland road to approximately 1-foot bgs.
- Discovered an additional gate valve box with a pipe underneath on the upland road.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Key dates:

On 10 April 2024, representatives from EPA, MassDEP, City of Boston, and DCR were on site to discuss the river access area.

Week of 15 April 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos Emma Dixon
START – Weston	Amy Klinger Paul Callahan William Mahany
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 1 laborer

Equipment on site: Same as previous week.

Activities for the week included:

- Conducted additional excavation of the central area due to levels of PCBs above the Action Level of 50 mg/kg based on the analytical results received on 21 March 2024. The central area was excavated an additional 1 foot to a total depth of 5 feet bgs, which met the water level of the river.
- Conducted dust suppression with copious amounts of water.
- Collected post-excavation samples from the central area, upland road, and riverbank for on-site field screening by the EPA Mobile Laboratory.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Key dates:

Between 16 and 18 April 2024, the EPA Mobile Laboratory was on site to perform field screening for PCBs and metals of samples collected by START.

Between 16 and 18 April 2024, START established sample locations on the riverbank every 20 feet to collect post-excavation samples. Samples were submitted to the EPA Mobile Laboratory for field screening of PCBs and metals. Two samples were collected every 20 feet: one sample was collected close to the river (BKP-020 through BKP-041), and the other was collected up the riverbank 2-3 feet (BKP-020A through BKP-041A).

After the additional excavation was completed, START also established a 20-foot x 20-foot grid in the central area. START collected post-excavation samples EXC-31 through EXC-50 and EXC-52 through EXC-58, including two duplicates, EXC-552 and EXC-555, which were submitted to the EPA Mobile Laboratory for field screening of PCBs and metals.

In addition, START re-established previous sample locations from the week of 12 February 2024 on the upland road to collect post-excavation samples. Samples were submitted to the EPA Mobile Laboratory for field screening for PCBs and metals.

At the completion of field screening, START submitted a portion of the screened samples to LSASD NERL for confirmatory analysis of PCBs and metals.

Week of 22 April 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos Abdine Ouedraogo
START – Weston	Amy Klinger
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site:

Type	Quantity
Pickup Trucks	2
Skid-Steer	1
Large Excavator	1
Large Excavator with Hammer attachment	1
Front End Loader	1
Trailer-Mounted Compressor	1
Pneumatic Pump and Hoses	1
Porta-Johns	2
Handwash station	1
Connex Storage Trailer	1
Office Trailers	2
500-Gallon Water Trailer	1
Lasar and Rod	1
Scissor Lift	2

Activities for the week included:

- Conducted excavation in the central area, the riverbank, and the upland road at locations that had field screening results from the previous week above the Action Level.
- Conducted excavation in the upland area at sample location B-110 due to PCB results above the Action Level of 50 mg/kg based on sample results from test pitting conducted the week of 3 April 2023.
- Discovered and excavated additional pleather material at sample location B-110.
- Conducted dust suppression with copious amounts of water.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Re-sampled locations that were excavated further based on field screening results in the central area, the riverbank, and the upland road. Samples were submitted to the mobile laboratory for PCB and metal screening.
- Conducted T&D of PCB-contaminated soil.
- Conducted air monitoring using combinations of DustTraks, AreaRAEs, and a MultiRAE.

Key dates:

On 24 April 2024, the EPA Mobile Laboratory was on site to perform field screening for PCBs and metals of post-excavation samples collected by START. At the completion of field screening, START submitted a portion of the screened samples to LSASD NERL for confirmatory analysis of PCBs and metals.

Between 25 and 26 April 2024, a total of 27 trucks were loaded with PCB-contaminated soil for transport off site. All T&D was performed following the Lewis Chemical traffic plan. Transportation was provided by Goulet Trucking Inc and Heritage Transport LLC; loads were transported either to Nashua, NH, or to the Worcester/Providence Railyard for continued transport to Heritage Environmental of Roachdale, IN.

Week of 29 April 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Amy Klinger
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site: Same as previous week.

Activities for the week included:

- Conducted T&D of PCB-contaminated soil.
- Secured stockpiled material with polyethylene sheeting at the end of each day.
- Graded the area where the stockpile was previously situated to prepare for START post-excavation sampling event the following week.
- Washed tree stumps and staged cleaned tree stumps adjacent to scrap metal pile.
- Conducted air monitoring using combinations of DustTraks and AreaRAEs.

Key Dates:

Between 29 April and 2 May 2024, a total of 50 trucks were loaded with PCB-contaminated soil for transport off site. All T&D was performed following the Lewis Chemical traffic plan. Transportation was provided by Goulet Trucking, Heritage Transport LLC, and Franks Vacuum Trucking; loads were transported either to Nashua, NH, or to the Worcester/Providence Railyard for continued transport to Heritage Environmental of Roachdale, IN.

Week of 6 May 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Amy Klinger Paul Callahan Liam Trainor

ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site:

Type	Quantity
Pickup Trucks	2
Skid-Steer	1
Large Excavator	1
Large Excavator with Hammer attachment	1
Front End Loader	1
Trailer-Mounted Compressor	1
Pneumatic Pump and Hoses	1
Porta-Johns	2
Handwash station	1
Connex Storage Trailer	1
Office Trailers	2
500-Gallon Water Trailer	1
Lasar and Rod	1

Activities for the week included:

- Power washed concrete that remained on the bottom of metal fence poles and broke up the concrete to use as backfill material.
- Conducted dust suppression with copious amounts of water throughout hammering activities.
- Collected post-excavation samples.
- Secured the soil on top of the retaining wall in the pleather area by placing large rocks above the wall near the railroad tracks.
- Removed metal from tires and placed in scrap pile for disposal.
- Took elevation readings from all excavation zones.
- Conducted air monitoring using DustTraks.

Key dates:

On 6 May 2024, a MassDEP representative was on site for updates.

On 7 May 2024, START collected post-excavation samples from the former stockpile area (SP-01 through SP-21) and loadout pad (LA-01 and LA-02). Samples were collected for PCBs, metals, and VOC analyses. Samples were also collected from the central area, the upland road, the pleather area, and the riverbank and submitted to LSASD NERL for VOC analysis.

Week of 13 May 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan

ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site: Same as previous week.

Activities for the week included:

- Removed remaining fence posts from across the Site, power-washed the concrete on the bottom, and jack-hammered the concrete to use as backfill.
- Conducted dust suppression with copious amounts of water throughout hammering activities.
- Collected soil samples from the soil mixed in with the concrete stockpile for backfill clearance.
- Separated the metal rim from the rubber on tires to prepare for disposal. A total of 36 tires were found during the excavation activities on the Site.
- Loaded a 40 CY roll-off container with scrap metal.
- Began placing broken up concrete from the stockpile near the bridge into the deepest excavated areas in the central area of the Site.
- Conducted air monitoring using DustTraks.
- Received processed gravel totaling 387.1 tons for backfill.

Key dates:

On 14 May 2024, START collected soil samples from the soil mixed in with the concrete stockpile. Samples were submitted to LSASD NERL for PCB and metals screening to clear the use of concrete as backfill material.

On 16 May 2024, screening results from the concrete stockpile indicated no levels of PCBs above the Site Action Level of 50 mg/kg and no levels of lead above the EPA RML for Residential Soil of 200 mg/kg.

Week of 20 May 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site:

Type	Quantity
Pickup Trucks	2
Skid-Steer	1
Large Excavator	1
Breaker Attachment for Skid-Steer	1

Type	Quantity
Front End Loader	1
Trailer-Mounted Compressor	1
Pneumatic Pump and Hoses	1
Porta-Johns	2
Handwash station	1
Connex Storage Trailer	1
Office Trailers	2
500-Gallon Water Trailer	1
Lasar and Rod	1
Vibratory Roller	1

Activities for the week included:

- Continued breaking up concrete that remained on the bottom of metal fence poles to use as backfill material. Dust suppression was utilized throughout hammering activities.
- Continued placing broken up concrete into the deepest excavated areas in the central area of the Site.
- Utilized the front-end loader to spread gravel over the concrete pieces used as backfill. Water was used to help the fine gravel settle into the void spaces between the concrete. The excavator was used to compact the concrete and gravel.
- Concrete from the former loading platform was used as backfill material in the central area of the Site.
- Removed the silt fence, high visibility fence, and erosion control sediment sock along the riverbank.
- Received processed gravel totaling 117.9 tons, and stockpiled material along the concrete foundation wall.

Key dates:

On 21 May 2024, a vibratory roller was delivered to site for backfilling activities to assist in compaction.

Week of 27 May 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site: Same as previous week.

Activities for the week included:

- Continued backfilling with broken up concrete and gravel that was delivered by PA Landers. All incoming truck traffic followed the Lewis Chemical traffic plan.
- Compacted backfill material with the vibratory roller in 6-inch lifts.

- Conducted dust suppression with copious amounts of water throughout hammering activities.
- Collected remaining pleather material that was visible across the Site for disposal.

Key dates:

On 29 May 2024, a meeting was held on site with community members and EPA.

Week of 3 June 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site: Same as previous week.

Activities for the week included:

- Placed polyethylene sheeting in the area behind the office trailers to prepare a staging area for removal of contaminated soil.
- Removed backfill from on top of the geotextile fabric and the geotextile fabric in the former stockpile area to prepare for removal of contaminated soil based on confirmatory results with elevated PCB levels.
- Excavated contaminated soil from the former stockpile area an additional 1-2 feet, and stockpiled the removed soil on top of the poly sheeting behind the office trailer.
- Covered the contaminated soil stockpile with polyethylene sheeting and placed armor stones between the stockpile and the riverbank to prevent runoff into the Neponset River in case of heavy rainfall.
- Received processed gravel totaling 186.21 tons for backfill.

Key dates:

On 4 June 2024, analytical results were received from LSASD NERL from the most recent post-excavation sampling event. The results indicated elevated levels of PCBs in the former stockpile area. The backfill soil and geotextile fabric were removed from the area, and additional excavation was conducted.

Week of 10 June 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site: Same as previous week.

Activities for the week included:

- Collected post-excavation samples from the former stockpile area after additional excavation was completed.
- Stockpiled contaminated soil on polyethylene sheeting in the new stockpile area behind the site trailers
- Compacted and leveled the former stockpile area and installed geotextile fabric prior to backfill.
- Continued backfilling with gravel and compacting in 6-in lifts.
- Placed geotextile fabric along the upland road near the MBTA fence and across the entire site to prepare for backfilling activities.
- Placed the first row of armor stone along the riverbank.
- Constructed a loadout platform with clean broken up concrete and gravel to prepare for T&D of the contaminated soil.

Key dates:

On 10 June 2024, START collected 14 post-excavation samples from the former stockpile area after excavation of an additional 1-2 feet was completed. Samples were submitted to the EPA Mobile Laboratory for PCB field screening. At the completion of field screening, START submitted two of the screened samples to LSASD NERL for confirmatory analysis of PCBs.

On 10 June 2024, EPA Mobile Laboratory was on site to conduct PCB screening. Field screening results indicated no PCBs present above the Site action level of 50 mg/kg.

Week of 17 June 2024

Personnel on site:

OSC – EPA	Emma Dixon
START – Weston	William Mahany
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site:

Type	Quantity
Pickup Trucks	2
Skid-Steer	1
Scissor Lift	2
Large Excavator	1
Breaker Attachment for Skid-Steer	1
Front End Loader	1
Trailer-Mounted Compressor	1
Pneumatic Pump and Hoses	1
Porta-Johns	2

Type	Quantity
Handwash station	1
Connex Storage Trailer	1
Office Trailers	2
500-Gallon Water Trailer	1
Lasar and Rod	1
Vibratory Roller	1

Activities for the week included:

- Completed T&D of PCB-contaminated soil.
- Conducted dust suppression with copious amounts of water throughout hammering activities.
- Received 36 loads of gravel backfill totaling 869.4 tons and stockpiled the gravel on site.
- Placed geotextile fabric across the site extending to the riverbank.
- Began re-constructing the riverbank.

Key Dates

On 17 June 2024, a total of six trucks were loaded with PCB-contaminated soil for transport off site. All T&D was performed following the Lewis Chemical traffic plan. Transportation was provided by Heritage Transport LLC to Nashua, NH for rail transport to Heritage Environmental of Roachdale, IN.

Week of 24 June 2024

Personnel on site:

OSC – EPA	Emma Dixon
START – Weston	William Mahany
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site:

Type	Quantity
Pickup Trucks	2
Skid-Steer	1
Large Excavator	1
Breaker Attachment for Skid-Steer	1
Front End Loader	1
Trailer-Mounted Compressor	1
Pneumatic Pump and Hoses	1
Porta-Johns	2
Handwash station	1
Connex Storage Trailer	1
Office Trailers	2
500-Gallon Water Trailer	1

Type	Quantity
Lasar and Rod	1
Vibratory Roller	1

Activities for the week included:

- Loaded previously washed tree stumps into a PA Landers dump truck for disposal.
- Placed/spread geotextile fabric in the pleather area.
- Spread and compacted gravel on top of the geotextile fabric on the upland road with the front end-loader and the vibratory roller.
- Continued re-constructing the riverbank.
- Received and stockpiled 12 loads of gravel from PA Landers totaling 284.08 tons.

Week of 1 July 2024

Personnel on site:

OSC – EPA	Emma Dixon
START – Weston	Paul Callahan
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site: Same as previous week.

Activities for the week included:

- Continued to spread and compact gravel and across the Site.
- Continued placing armor stones along the riverbank.

Week of 8 July 2024

Personnel on site:

OSC – EPA	Emma Dixon
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site: Same as previous week.

Activities for the week included:

- Continued to spread and compact gravel across the Site.
- Continued placing armor stones along the riverbank.
- Received and stockpiled 12 loads of gravel totaling 291.38 tons.

Week of 15 July 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
START – Weston	Amy Klinger
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site: Same as previous week.

Activities for the week included:

- Continued to spread and compact gravel across the Site.
- Continued placing armor stones along the riverbank with the excavator.
- Received and stockpiled 12 loads of gravel totaling 280.54 tons.

Key dates:

On 18 July 2024, a representative from Hyde Park Historical Society came by to discuss preservation of the mill stones unearthed at the Site.

Week of 22 July 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site: Same as previous week.

Activities for the week included:

- Continued to spread and compact gravel across the Site.
- Continued placing armor stones along the riverbank with the excavator.
- Received and stockpiled four loads of gravel totaling 97.86 tons.

Week of 29 July 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site: Same as previous week.

Activities for the week included:

- Received and stockpiled 18 deliveries of topsoil totaling 396 cubic yards. Topsoil was covered with poly sheeting to protect from heavy rainfall.
- Continued to spread and compact gravel across the Site.
- Continued placing armor stones along the riverbank with the excavator.
- Received and stockpiled two loads of gravel totaling 50.96 tons.

Key dates:

On 29 July 2024, a meeting was held on site with EPA Removal, Remedial, and Enforcement representatives and a MassDEP representative. Discussions centered on access to the river from the Lewis Chemical Site.

Week of 5 August 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
ERRS RM – ER LLC	Josue Vega Santos
Crew – ER LLC	2 operators 2 laborers

Equipment on site: Same as previous week.

Activities for the week included:

- Received and stockpiled two loads of gravel totaling 49.93 tons.
- Continued to spread and compact gravel across the Site.

Week of 12 August 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
ERRS RM – ER LLC	Josue Vega Santos Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site: Same as previous week.

Activities for the week included:

- Continued to spread and compact gravel across the Site.
- Began re-grading the riverbank in accordance with the plan agreed upon with DCR, the City of Boston, and EPA to facilitate access to the river. The access way to the river would be constructed using armor stone at the lowest point of the access way to the river. The access roadway would include a layer of geotextile fabric, a layer of stone dust, a layer of

1.5-inch stone, and a final layer of stone dust for compaction purposes. This process would be wetted down with water and compacted using a vibratory roller and a plate compactor. An armor stone wall would be constructed at the base of the access way to keep any soil from falling onto the access way.

- Began spreading topsoil in the southern end of the Site.
- Placed erosion control sediment socks along the top of the riverbank to prevent soil from getting into the river during heavy rainstorms.
- Filled in void areas with gravel along the riverbank.
- Placed topsoil along the MBTA fence line to stabilize the surrounding area.

Week of 19 August 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site: Same as previous week.

Activities for the week included:

- Continued re-grading the riverbank.
- Continued spreading topsoil across the Site working south to north.
- Received and stockpiled 14 loads of topsoil totaling 308 cubic yards.
- Received and stockpiled two loads of stone dust totaling 44.49 tons.
- Received and stockpiled two loads of 1.5-inch stone totaling 47.16 tons.

Key dates:

On 20 August 2024, a replacement fence for the adjacent Aspen Consulting was ordered.

Week of 26 August 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site: Same as previous week.

Activities for the week included:

- Continued re-grading the riverbank.
- Continued spreading topsoil across the Site working south to north.

- Placed armor stones and granite curbing found during excavation along the sides of the river access area to act as barriers.
- Placed geotextile fabric along the river access area from the water's edge to approximately 30 ft up the riverbank.
- Received and stockpiled two loads of stone dust totaling 46.64 tons.
- Spread stone dust across the river access area to create a driving surface, and compacted the surface with the vibratory roller and a plate compactor.

Key dates:

On 28 August 2024, Ultra Safe Pest was on site to pick up rodent boxes.

Week of 2 September 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
ERRS RM – ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site: Same as previous week.

Activities for the week included:

- Continued re-grading the riverbank.
- Loosened/tilled the previously spread topsoil to prepare for hydroseeding.
- Continued spreading topsoil across the Site working south to north.

Key dates:

On 5 September 2024, Wagon Wheel Landscape was on site to discuss hydroseeding operations schedule.

Week of 9 September 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
ERRS RM– ER LLC	Rick Ramuglia
Crew – ER LLC	1 operator 2 laborers

Equipment on site:

Type	Quantity
Pickup Trucks	2
Skid-Steer	1
Large Excavator	1
Breaker Attachment for Skid-Steer	1

Type	Quantity
Front End Loader	1
Porta-Johns	2
Handwash station	1
Connex Storage Trailer	1
Office Trailers	2
500-Gallon Water Trailer	1
Vibratory Roller	1

Activities for the week included:

- Continued spreading topsoil across the Site in low areas in preparation for hydroseeding.
- Placed erosion control sediment socks on the upland side of the river access area.
- Hydroseeded and watered the entire site.
- Cleaned equipment in preparation for demobilization.
- Demobilized equipment.

Week of 16 September 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
ERRS RM– ER LLC	Rick Ramuglia
Crew – ER LLC	1 operator 2 laborers

Equipment on site: Same as previous week.

Activities for the week included:

- Resurfaced the road under the bridge utilizing stone, gravel, and stone dust.
- Continued cleaning and demobilized equipment from Site.
- Continued watering the hydroseeded area due to lack of recent rain.
- Cleaned the trailers on site to prepare for demobilization.
- Installed a new fence on the southeast side of Aspen Consulting property.

Key dates

On 19 September 2024, the ERRS RM met with Aspen Consulting to discuss a fence replacement and crushed stone for the driveway of the property.

Week of 23 September 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos
ERRS RM– ER LLC	Rick Ramuglia
Crew – ER LLC	1 operator 2 laborers

Equipment on site:

Type	Quantity
Pickup Trucks	1
Porta-Johns	2
Handwash station	1
Connex Storage Trailer	1
Office Trailers	2

Activities for the week included:

- Restored the Aspen Consulting driveway to its original condition per the property owner's request.
- Placed cobblestones and spread mulch around the newly installed fence at the Aspen Consulting property.
- Demobilized sidewalk barriers and other equipment from the Site.

Week of 30 September 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos Emma Dixon
Crew – ER LLC	2 laborers

Equipment on site: Same as previous week.

Key dates:

On 4 October 2024, a press event was held at the Site to celebrate the completion of the Lewis Chemical removal action. The event was attended by EPA representatives, EPA Regional Administrator, Mayor of the City of Boston, additional City representatives, DCR representatives, MassDEP representatives, members of community organizations, and the press.

Week of 21 October 2024

Personnel on site:

OSC – EPA	Athanasios Hatzopoulos Emma Dixon
ERRS RM– ER LLC	Rick Ramuglia
Crew – ER LLC	2 operators 2 laborers

Equipment on site: Same as previous week

Activities for the week included:

- Completed restoration of the Aspen Consulting property by spreading 3/8-inch crushed stone.
- Demobilized personnel and equipment.

Key Dates:

On 22 October 2024, all personnel and equipment were demobilized from the Site.

4.0 ESTIMATED COSTS OF THE REMOVAL ACTION

EPA resources committed under this Removal Action are summarized below:

Cost Category	Ceiling	Costs Incurred	Remainder
Regional Removal Allowance Costs			
ERRS	\$3,920,000	\$3,500,000	\$420,000
START Contractor	\$345,000	\$345,000	\$0
Other Extramural Costs Not Funded from the Regional Allowance			
Extramural Contingency	\$653,000	\$97,140	\$574,845
Total Removal Project Costs	\$4,918,000	\$3,923,155	\$994,845

This accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

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- [5] Massachusetts Department of Environmental Protection (MassDEP). Letter to US EPA from MassDEP, Request for Assistance from US EPA at former Lewis Chemical Site. 9 November 2022.
- [6] CDW Consultants. TSCA Risk-Based Cleanup & Disposal Plan. 3 November 2022.
- [7] Weston Solutions, Inc. 2023. Health and Safety Plan for the Lewis Chemical Site, Hyde Park, Suffolk County, Massachusetts. March.
- [8] Weston Solutions, Inc. July 2020. Standard Operating Procedure for Surface and Subsurface Soil Sampling, SOP No. WSI/S5-001, Superfund Technical Assessment and Response Team V (START), North Billerica, Massachusetts.
- [9] Weston Solutions, Inc. July 2020. Standard Operating Procedure for PID-MultiRAE (Multi-Gas Monitor with VOC Detection and LEL) RAE Model PGM-50 Multi-Gas Monitor (MultiRAE), SOP No. WSI/S5-018, Superfund Technical Assessment and Response Team V (START), North Billerica, Massachusetts.
- [10] Weston Solutions, Inc. July 2020. Standard Operating Procedure for Asbestos Sampling, SOP No. WSI/S5-019, Superfund Technical Assessment and Response Team V (START), North Billerica, Massachusetts.

Appendices

Appendix A

Figures

- Figure 1 - Site Location Map
- Figure 2 - Site Diagram and Post-Excavation Sample Locations
- Figure 2A - Upland Post-Excavation Sample Locations
- Figure 2B - Riverbank Post-Excavation Sample Locations
- Figure 2C - Central Area Post-Excavation Sample Locations
- Figure 2D - Pleather Area Post-Excavation Sample Locations
- Figure 2E - Former Stockpile Area Post-Excavation Sample Locations

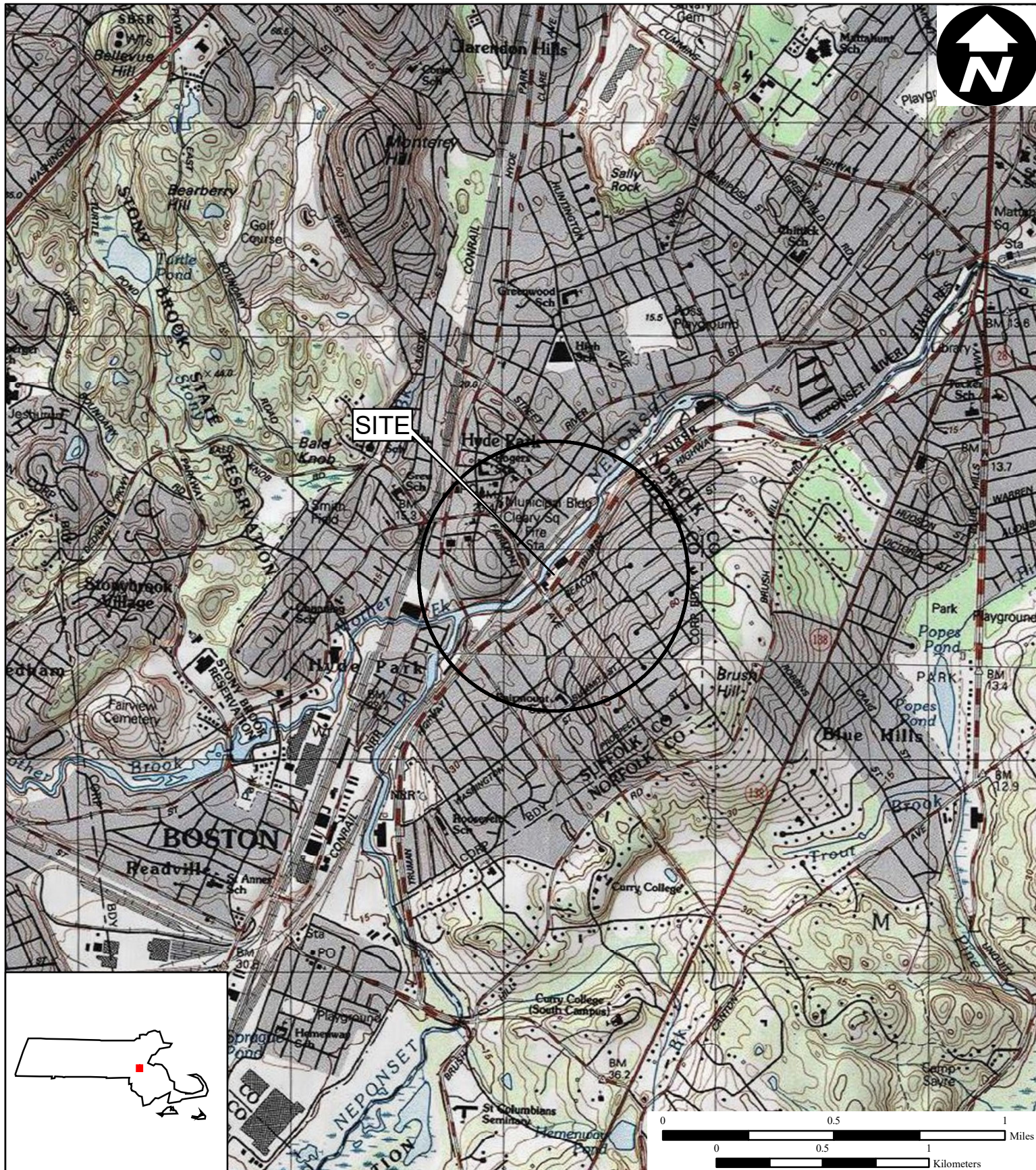


Figure 1

Site Location Map

**Lewis Chemical Site
12-24 Fairmount Court
Hyde Park, Massachusetts**

**EPA Region I
Superfund Technical Assessment and
Response Team (START) V
Contract No. 68HE0120D0001**

AD Number: TOFP-01-23-02-0001
Created by: T. Evans
Created on: 2 November 2023
Modified by: A. Klinger
Modified on: 14 October 2024

Data Sources:

Topos: MicroPath/USGS/USA Topo Maps
Quadrangle Name(s): Norwood
All other data: START





Figure 2
Site Diagram and Post-Excavation Sample Locations

Lewis Chemical Site
12-24 Fairmount Court
Hyde Park, Massachusetts

EPA Region I
Superfund Technical Assessment and Response Team (START) V
Contract No. 68HE0120D0001
AD Number: TOFP-01-23-02-0001
Created by: B. Mahany
Created on: 12 October 2023
Modified by: A. Klinger
Modified on: 19 February 2025

LEGEND

- Site Boundary
- Excavation Zones
- Post-Excavation Sample Locations

NOTES:

Excavation zones are called out by "Area" and depth of excavation in feet (ft) below ground surface (bgs).

*Pleather excavation zone was backfilled approximately 4 ft.



0 25 50 100
 Feet

Data Sources:

Imagery: ESRI, ArcGIS.com, MassGIS
 Topos: USA TopoMaps
 All other data: START





Figure 2A

**Upland Post-Excavation
Sample Locations**

**Lewis Chemical Site
12-24 Fairmount Court
Hyde Park, Massachusetts**

EPA Region I

**Superfund Technical Assessment and
Response Team (START) V**

Contract No. 68HE0120D0001

AD Number: TOFP-01-23-02-0001




Created by: B. Mahany

Created on: 12 October 2023

Modified by: A. Klinger

Modified on: 10 February 2025

LEGEND

-  Site Boundary
-  Excavation Zones
-  Upland Sample Locations

NOTES:

Excavation zones are called out by "Area" and depth of excavation in feet (ft) below ground surface (bgs).

Sample locations not in an excavation zone were collected from test pits 0-2 ft bgs. No subsequent excavation was conducted at these sample locations.



0 25 50
Feet

Data Sources:

Imagery: ESRI, ArcGIS.com, MassGIS

Topos: USA TopoMaps

All other data: START





Figure 2B
Riverbank Post-Excavation
Sample Locations
Lewis Chemical Site
12-24 Fairmount Court
Hyde Park, Massachusetts

EPA Region I
 Superfund Technical Assessment and
 Response Team (START) V
 Contract No. 68HE0120D0001
 AD Number: TOFP-01-23-02-0001
 Created by: B. Mahany
 Created on: 12 October 2023
 Modified by: A. Klinger
 Modified on: 19 February 2025

LEGEND

- Site Boundary
- Excavation Zones
- Riverbank Sample Locations

NOTES:

Excavation zones are called out by "Area" and depth of excavation in feet (ft) below ground surface (bgs).



0 25 50 100
 Feet

Data Sources:

Imagery: ESRI, ArcGIS.com, MassGIS
 Topos: USA TopoMaps
 All other data: START





Figure 2C
Central Area Post-Excavation
Sample Locations
Lewis Chemical Site
12-24 Fairmount Court
Hyde Park, Massachusetts

EPA Region I
Superfund Technical Assessment and
Response Team (START) V
Contract No. 68HE0120D0001
AD Number: TOFP-01-23-02-0001
Created by: B. Mahany
Created on: 12 October 2023
Modified by: A. Klinger
Modified on: 10 February 2025

LEGEND

- Site Boundary
- Excavation Zones
- Central Area Sample Locations

NOTES:

Excavation zones are called out by "Area" and depth of excavation in feet (ft) below ground surface (bgs).



0 25 50
 Feet

Data Sources:

Imagery: ESRI, ArcGIS.com, MassGIS
 Topos: USA TopoMaps
 All other data: START





Figure 2D
Pleather Area Post-Excavation
Sample Locations

Lewis Chemical Site
12-24 Fairmount Court
Hyde Park, Massachusetts

EPA Region I
Superfund Technical Assessment and
Response Team (START) V
Contract No. 68HE0120D0001
AD Number: TOFP-01-23-02-0001
Created by: B. Mahany
Created on: 12 October 2023
Modified by: A. Klinger
Modified on: 10 February 2025

LEGEND

- Site Boundary
- Excavation Zones
- Pleather Area Sample Locations

NOTES:

Excavation zones are called out by "Area" and depth of excavation in feet (ft) below ground surface (bgs).



0 25 50
 Feet

Data Sources:

Imagery: ESRI, ArcGIS.com, MassGIS
 Topos: USA TopoMaps
 All other data: START



Figure 2E
Former Stockpile Area
Post-Excavation Sample Locations

Lewis Chemical Site
12-24 Fairmount Court
Hyde Park, Massachusetts

EPA Region I
Superfund Technical Assessment and
Response Team (START) V
Contract No. 68HE0120D0001
AD Number: TOFP-01-23-02-0001
Created by: B. Mahany
Created on: 12 October 2023
Modified by: A. Klinger
Modified on: 7 February 2025

LEGEND

- Site Boundary
- Excavation Zones
- Former Stockpile Area Sample Locations

NOTES:

Excavation zones are called out by "Area" and depth of excavation in feet (ft) below ground surface (bgs).

*Location was sampled at 2-3 ft bgs and not at the final excavation depth due to PCB levels less than 50 milligrams/kilogram at nearby sample locations.



0 25 50
 Feet

Data Sources:

Imagery: ESRI, ArcGIS.com, MassGIS
 Topos: USA TopoMaps
 All other data: START



Appendix B

Photo-documentation Log

PHOTODOCUMENTATION LOG
Lewis Chemical • Hyde Park, Massachusetts



SCENE: View of the former Lewis Chemical building concrete pad prior to the start of removal activities. The concrete pad is in the central area of the Site. Photograph taken facing southwest.

DATE: 16 March 2023

PHOTOGRAPHER: P. Callahan

TIME: 1154 hours

CAMERA: Apple iPhone 13



SCENE: View of the Site prior to the start of removal activities. The land to the north of the concrete pad is referred to as the upland road. Photograph taken facing southwest.

DATE: 4 April 2023

PHOTOGRAPHER: P. Callahan

TIME: 1426 hours

CAMERA: Apple iPhone 13

PHOTODOCUMENTATION LOG
Lewis Chemical • Hyde Park, Massachusetts



SCENE: View of one of the test pits that were excavated to conduct extent-of-contamination (EOC) sampling and determine if volatile organic compound (VOC) suppressant foam would be utilized throughout the removal action.

DATE: 12 June 2023

TIME: 1110 hours

PHOTOGRAPHER: L. Trainor

CAMERA: Apple iPhone 13



SCENE: View of the bottomless concrete rectangular structure found during test pitting activities between the edge of the concrete pad and the riverbank. The bell end of an 8-inch clay pipe was discovered at the base of the rectangular structure.

DATE: 14 June 2023

TIME: 1247 hours

PHOTOGRAPHER: A. Hatzopoulos

CAMERA: Unknown

PHOTODOCUMENTATION LOG
Lewis Chemical • Hyde Park, Massachusetts



SCENE: View of the edge of the concrete pad where the bottomless concrete rectangular structure and the bell end of an 8-inch clay pipe was discovered during test pitting activities. Photograph taken facing northwest.

DATE: 14 June 2023

TIME: 1249 hours

PHOTOGRAPHER: A. Hatzopoulos

CAMERA: Unknown



SCENE: View of the extent of the “pleather” material at the southwest portion of the Site. This portion of the Site is referred to as the pleather area. Photograph taken facing southwest.

DATE: 21 June 2023

TIME: 0742 hours

PHOTOGRAPHER: P. Callahan

CAMERA: Apple iPhone 13

PHOTODOCUMENTATION LOG
Lewis Chemical • Hyde Park, Massachusetts



SCENE: View of air monitoring and dust/odor suppression being utilized at the southwest portion of the Site during excavation of pleather material.

DATE: 14 June 2023

PHOTOGRAPHER: L. Trainor

TIME: 1433 hours

CAMERA: Apple iPhone 13



SCENE: View of the stockpile of pleather material removed from the southwest portion of the Site, staged in preparation for disposal. Photograph taken facing north.

DATE: 27 June 2023

PHOTOGRAPHER: P. Callahan

TIME: 1316 hours

CAMERA: Apple iPhone 13

PHOTODOCUMENTATION LOG
Lewis Chemical • Hyde Park, Massachusetts



SCENE: View of the retaining wall unearthed during excavation activities in the southwest portion of the Site. Photograph taken facing north.

DATE: 17 July 2023

PHOTOGRAPHER: P. Callahan

TIME: 0746 hours

CAMERA: Apple iPhone 13



SCENE: View of the concrete slab being broken up into pieces, including utilization of dust suppression methods. Photograph taken facing east.

DATE: 20 September 2023

PHOTOGRAPHER: P. Callahan

TIME: 1402 hours

CAMERA: Apple iPhone 13

PHOTODOCUMENTATION LOG
Lewis Chemical • Hyde Park, Massachusetts



SCENE: View of the Boston Water and Sewer Department (BWS) pipe located on the upland road between the railroad tracks and the retaining wall. Photograph taken facing southwest.

DATE: 19 October 2023

PHOTOGRAPHER: P. Callahan

TIME: 0750 hours

CAMERA: Apple iPhone 13



SCENE: View of air monitoring station, including a DustTrak and an AreaRAE, deployed at the Site between the railroad station and the work area. Photograph taken facing north.

DATE: 23 October 2023

PHOTOGRAPHER: P. Callahan

TIME: 0805 hours

CAMERA: Apple iPhone 13

PHOTODOCUMENTATION LOG
Lewis Chemical • Hyde Park, Massachusetts



SCENE: View of excavation progress in the central area. Large rocks were placed at the edges of the excavation pit to prevent vehicles from entering. The white material visible on the left side is VOC suppressant foam. Photograph taken facing southwest.

DATE: 24 October 2023

TIME: 1517 hours

PHOTOGRAPHER: P. Callahan

CAMERA: Apple iPhone 13



SCENE: View of the central area after the excavation of contaminated soil. The central area was located at the former Lewis Chemical loading dock. Photograph taken facing north.

DATE: 31 October 2023

TIME: 1018 hours

PHOTOGRAPHER: P. Callahan

CAMERA: Apple iPhone 13

PHOTODOCUMENTATION LOG
Lewis Chemical • Hyde Park, Massachusetts



SCENE: View of the southwest area of the Site after the excavation of the pleather material and contaminated soil. Photograph taken facing southwest.

DATE: 31 October 2023

PHOTOGRAPHER: P. Callahan

TIME: 1436 hours

CAMERA: Apple iPhone 13



SCENE: View of the central area of the Site after excavation of polychlorinated biphenyl (PCB)-contaminated soil. Photograph taken facing southwest.

DATE: 9 November 2023

PHOTOGRAPHER: P. Callahan

TIME: 1117 hours

CAMERA: Apple iPhone 13

PHOTODOCUMENTATION LOG
Lewis Chemical • Hyde Park, Massachusetts



SCENE: View of the excavation of the 8-inch clay pipe discovered during test pitting activities the week of 12 June 2023. The pipe extended under the former concrete pad and ran toward the Neponset River. Photograph taken facing northwest.

DATE: 15 November 2023

TIME: 1105 hours

PHOTOGRAPHER: R. Ramuglia

CAMERA: Samsung Galaxy S10e



SCENE: View of the utilization of VOC suppressant foam to minimize vapors of soil underneath the concrete pad. Photograph taken facing northeast.

DATE: 21 November 2023

TIME: 1115 hours

PHOTOGRAPHER: P. Callahan

CAMERA: Apple iPhone 13

PHOTODOCUMENTATION LOG
Lewis Chemical • Hyde Park, Massachusetts



SCENE: View of the concrete foundation of Lewis Chemical broken up to allow for removal of PCB-contaminated soil underneath. Photograph taken facing north.

DATE: 29 November 2023

PHOTOGRAPHER: P. Callahan

TIME: 1323 hours

CAMERA: Apple iPhone 13



SCENE: View of the central area flooded with water following heavy rains. The central area was located by the former loading dock of Lewis Chemical. Photograph taken facing southwest.

DATE: 19 December 2023

PHOTOGRAPHER: P. Callahan

TIME: 0743 hours

CAMERA: Apple iPhone 13

PHOTODOCUMENTATION LOG
Lewis Chemical • Hyde Park, Massachusetts



SCENE: View of the riverbank during excavation activities and removal of armor stones. Photograph taken facing northeast.

DATE: 11 January 2024

TIME: 0723 hours

PHOTOGRAPHER: P. Callahan

CAMERA: Apple iPhone 13



SCENE: View of the large concrete block with oil-like staining that was approximately 8 feet by 7 feet by 5 feet, with broken, deteriorated pipes and a large metal piston-type device protruding from the block. Photograph taken facing northeast.

DATE: 18 January 2024

TIME: 1024 hours

PHOTOGRAPHER: R. Ramuglia

CAMERA: Unknown

PHOTODOCUMENTATION LOG
Lewis Chemical • Hyde Park, Massachusetts



SCENE: View of the metal removed from the large concrete block with oil-like staining and the large protruding metal piston-type device. Photograph taken facing northeast.

DATE: 18 January 2024

PHOTOGRAPHER: P. Callahan

TIME: 1306 hours

CAMERA: Apple iPhone 13



SCENE: View of loadout of stockpiled PCB-contaminated soil into trucks for transport to the disposal facility. Photograph taken facing northeast.

DATE: 30 January 2024

PHOTOGRAPHER: P. Callahan

TIME: 1116 hours

CAMERA: Apple iPhone 13

PHOTODOCUMENTATION LOG
Lewis Chemical • Hyde Park, Massachusetts



SCENE: View of the depth of excavation on the riverbank after the armor stones were removed. Photograph taken facing south.

DATE: 27 February 2024

PHOTOGRAPHER: P. Callahan

TIME: 0859 hours

CAMERA: Apple iPhone 13



SCENE: View of the flooding in the main excavation area. Photograph taken facing south.

DATE: 5 March 2024

PHOTOGRAPHER: P. Callahan

TIME: 1432 hours

CAMERA: Apple iPhone 13

PHOTODOCUMENTATION LOG
Lewis Chemical • Hyde Park, Massachusetts



SCENE: View of the riverbank after removal of armor stones and subsequent excavation. Photograph taken facing southwest.

DATE: 26 March 2024

PHOTOGRAPHER: P. Callahan

TIME: 0720 hours

CAMERA: Apple iPhone 13



SCENE: View of the northern end of the riverbank after excavation and removal of pleather material (sample locations B-110 and BKP-041). Photograph taken facing south.

DATE: 24 April 2024

PHOTOGRAPHER: A. Klinger

TIME: 1513 hours

CAMERA: Apple iPhone 13

PHOTODOCUMENTATION LOG
Lewis Chemical • Hyde Park, Massachusetts



SCENE: View of the riverbank after re-excitation at sample locations BKP-029, BKP-030, and BKP-031. Photograph taken facing northeast.

DATE: 25 April 2024

PHOTOGRAPHER: P. Callahan

TIME: 1357 hours

CAMERA: Apple iPhone 13



SCENE: View of vertical pipes located on the upland road after excavation to 3-4 feet below ground surface (bgs), near sample locations KP-020, KP-030, and KP-040. Photograph taken facing east.

DATE: 25 April 2024

PHOTOGRAPHER: A. Klinger

TIME: 1405 hours

CAMERA: Apple iPhone 13

PHOTODOCUMENTATION LOG
Lewis Chemical • Hyde Park, Massachusetts



SCENE: View of the central area at the final post-excavation depth of 4-5 feet bgs. Photograph taken facing southwest.

DATE: 29 April 2024

TIME: 1320 hours

PHOTOGRAPHER: A. Klinger

CAMERA: Apple iPhone 13



SCENE: View of post-excavation sampling locations SP-01 through SP-21, in the former stockpile area. Photograph taken facing southwest.

DATE: 7 May 2024

TIME: 0657 hours

PHOTOGRAPHER: L. Trainor

CAMERA: Apple iPhone 13

PHOTODOCUMENTATION LOG
Lewis Chemical • Hyde Park, Massachusetts



SCENE: View of the former stockpile area after excavation, loadout, and disposal of PCB-contaminated soil. Photograph taken facing southwest.

DATE: 9 May 2024

PHOTOGRAPHER: A. Klinger

TIME: 1430 hours

CAMERA: Apple iPhone 13



SCENE: View of the orange geotextile fabric placed on the excavated areas as a delineation marker prior to backfilling activities in the central area. Photograph taken facing south

DATE: 14 May 2024

PHOTOGRAPHER: B. Mahany

TIME: 1024 hours

CAMERA: Apple iPhone 13

PHOTODOCUMENTATION LOG
Lewis Chemical • Hyde Park, Massachusetts



SCENE: View of backfilling activities in the central area. Backfill material was spread on top of orange geotextile fabric (not shown in photograph). Photograph taken facing east.

DATE: 15 May 2024

PHOTOGRAPHER: B. Mahany

TIME: 1535 hours

CAMERA: Apple iPhone 13



SCENE: View of the armor stones reinstalled along the riverbank at the completion of excavation and backfill activities. The red tape on the pole in the foreground indicates the height of the armor stones before excavation began. Photograph taken facing northeast.

DATE: 25 June 2024

PHOTOGRAPHER: B. Mahany

TIME: 1152 hours

CAMERA: Apple iPhone 13

PHOTODOCUMENTATION LOG
Lewis Chemical • Hyde Park, Massachusetts



SCENE: View of the central area and the upland road at the completion of backfilling activities. Large stones are remaining armor stones to be placed back on the riverbank. Photograph taken facing north.

DATE: 25 June 2024

TIME: 1151 hours

PHOTOGRAPHER: B. Mahany

CAMERA: Apple iPhone 13



SCENE: View of the upland road at the completion of backfilling activities. Photograph taken facing southwest.

DATE: 2 July 2024

TIME: 0735 hours

PHOTOGRAPHER: P. Callahan

CAMERA: Apple iPhone 13

PHOTODOCUMENTATION LOG
Lewis Chemical • Hyde Park, Massachusetts



SCENE: View of Site restoration and backfilling activities. Photograph taken facing southwest.

DATE: 18 July 2024

PHOTOGRAPHER: A. Klinger

TIME: 0847 hours

CAMERA: Apple iPhone 13



SCENE: View of the river access point for the Lower Neponset River (LNR) National Priorities List (NPL) Site and topsoil spreading activities on the Site. Photograph taken facing southwest.

DATE: 13 August 2024

PHOTOGRAPHER: A. Klinger

TIME: 0946 hours

CAMERA: Apple iPhone 13

PHOTODOCUMENTATION LOG
Lewis Chemical • Hyde Park, Massachusetts



SCENE: View of the Site after backfilling, hydroseeding, and restoration was completed.

DATE: 9 October 2024

PHOTOGRAPHER: A. Klinger

TIME: 1034 hours

CAMERA: Apple iPhone 13



SCENE: View of the river access point to the Neponset River at the completion of grading and restoration. Photograph taken facing northeast.

DATE: 9 October 2024

PHOTOGRAPHER: A. Klinger

TIME: 1030 hours

CAMERA: Apple iPhone 13

Appendix C

Table 1 - Post-Excavation Sample Results

TABLE 1
POST-EXCAVATION SAMPLE RESULTS
LEWIS CHEMICAL SITE
HYDE PARK, MASSACHUSETTS

Sample Location ID	Sample Depth BGS	Analysis Type	PCBs (mg/kg)	Lead (mg/kg)	TCE (µg/kg)	PCE (µg/kg)
Site Specific Cleanup Goal for Riverbank:			25	--	--	--
Site Specific Cleanup Goal for Mainland:			50	--	--	--
EPA RML Res:			23	400	240,000	12,000
EPA RML Ind:			94	800	1,200,000	56,000
A-060	0-2 ft	LA	ND	73	ND	ND
B-070	0-2 ft	LA	ND	190	ND	ND
B-090	0-2 ft	LA	ND	50	ND	ND
B-110	5-6 ft	FS	35	170	180	240
C-010	0-2 ft	LA	ND	230	ND	ND
C-030	0-2 ft	LA	ND	56	ND	ND
C-530	0-2 ft	LA	ND	64	ND	ND
C-050	0-2 ft	LA	ND	71	ND	ND
C-070	0-2 ft	LA	ND	64	ND	ND
C-570	0-2 ft	LA	ND	54	ND	ND
C-090	0-2 ft	LA	ND	83	ND	ND
C-110	0-2 ft	LA	ND	52	ND	ND
D-010	0-2 ft	LA	0.46	390	ND	ND
D-510	0-2 ft	LA	ND	340	92	ND
D-030	0-2 ft	LA	1.7	160	500	120
D-050	0-2 ft	LA	ND	62	ND	ND
D-070	0-2 ft	LA	ND	79	100	ND
D-590	0-2 ft	LA	ND	71	ND	ND
D-090	0-2 ft	LA	ND	51	ND	ND
D-110	0-2 ft	LA	ND	160	ND	ND
E-010	0-2 ft	LA	ND	470	ND	ND
E-030	0-2 ft	LA	3.9	160	520	380
E-050	0-2 ft	LA	0.58	190	190	240
E-070	0-2 ft	LA	ND	52	ND	ND
E-090	0-2 ft	LA	ND	72	120	390
E-110	0-2 ft	LA	ND	230	190	400
F-010	0-2 ft	LA	2.8	200	ND	ND
F-030	0-2 ft	LA	ND	380	ND	ND
G-010	0-2 ft	LA	0.35	530	190	200
G-030	0-2 ft	LA	0.24	250	ND	ND
H-010	0-2 ft	LA	ND	210	220	ND
H-030	0-2 ft	LA	ND	100	ND	ND
I-010	0-2 ft	LA	ND	620	220	ND
I-030	0-2 ft	LA	0.7	480	210	110
J-010	0-2 ft	LA	ND	880	230,000	12,000
J-030	0-2 ft	LA	2.2	630	560	2,800

TABLE 1
POST-EXCAVATION SAMPLE RESULTS
LEWIS CHEMICAL SITE
HYDE PARK, MASSACHUSETTS

Sample Location ID	Sample Depth BGS	Analysis Type	PCBs (mg/kg)	Lead (mg/kg)	TCE (µg/kg)	PCE (µg/kg)
Site Specific Cleanup Goal for Riverbank:			25	--	--	--
Site Specific Cleanup Goal for Mainland:			50	--	--	--
EPA RML Res:			23	400	240,000	12,000
EPA RML Ind:			94	800	1,200,000	56,000
PL-10-0	8-10 ft	LS	1.7			
PL-10-19	8-10 ft	LS	4			
PL-30-0	8-10 ft	LS	0.92			
PL-30-20	8-10 ft	LS	3.5	280	4,200	2,600
PL-30-40	8-10 ft	LS	4.8			
PL-50-0	8-10 ft	LS	6.5			
PL-50-20	8-10 ft	LS	4.5			
PL-50-40	8-10 ft	LS	7.8			
PL-70-0	8-10 ft	LS	26			
PL-70-20	8-10 ft	LS	11	310	5,200	4,000
PL-70-40	8-10 ft	LS	6.2			
PL-90-0	8-10 ft	LS	3.4			
PL-90-20	8-10 ft	LS	10			
PL-90-40	8-10 ft	LS	8.2			
PL-10A	3-4 ft	LS	1.7			
PL-30A	3-4 ft	LS	2.9			
PL-50A	3-4 ft	LS	8.9			
PL-70A	3-4 ft	LS	17			
PL-150-140	8-10 ft	LS	7.3			
KP-000	1-2 ft	LA	0.79			
KP-010	1-2 ft	FS	2.8	245	500	740
KP-020	1-2 ft	FS	4.7	280	520	2,100
LP-000	1-2 ft	FS	3	505		
LP-015	1-2 ft	FS	3.9	593	3,500	2,100
MP-000	1-2 ft	LA	0.49	82		
MP-000	1-2 ft	FS	0.4	79		
MP-015	1-2 ft	FS	4.9	568	6,800	5,400
NP-000	1-2 ft	FS	1.7	183		
NP-010	1-2 ft	FS	3.4	546	17,000	6,500
OP-000	1-2 ft	FS	1	249		
OP-010	1-2 ft	FS	2.9	777	1,000	630
PP-000	1-2 ft	FS	2.7	151	47	ND
PP-010	1-2 ft	FS	3.2	206		
QP-000	1-2 ft	FS	3.1	128		
QP-010	1-2 ft	FS	1.3	177	6,000	2,000
RP-000	1-2 ft	FS	4.8	107		
PL-90A	4-5 ft	FS	3.5	168	1,400	330

TABLE 1
POST-EXCAVATION SAMPLE RESULTS
LEWIS CHEMICAL SITE
HYDE PARK, MASSACHUSETTS

Sample Location ID	Sample Depth BGS	Analysis Type	PCBs (mg/kg)	Lead (mg/kg)	TCE (µg/kg)	PCE (µg/kg)
Site Specific Cleanup Goal for Riverbank:			25	--	--	--
Site Specific Cleanup Goal for Mainland:			50	--	--	--
EPA RML Res:			23	400	240,000	12,000
EPA RML Ind:			94	800	1,200,000	56,000
KP-040	4 ft	FS	24	1,900	190	270
KP-030	4 ft	FS	3.8	210	1,900	7,000
BKP-020	4-5 ft	FS	6.7	119		
BKP-021	4-5 ft	FS	8	111		
BKP-022	4-5 ft	LA	15	240		
BKP-022	4-5 ft	FS	24	217		
BKP-023	4-5 ft	FS	4.6	209		
BKP-024	4-5 ft	FS	2.7	153		
BKP-025	4-5 ft	FS	8.8	124	5,100	4,000
BKP-026	4-5 ft	LS	17	210		
BKP-026	4-5 ft	FS	14	194		
BKP-027	4-5 ft	FS	1.4	185	3,400	1,200
BKP-031	4-5 ft	FS	7	424		
BKP-032	4-5 ft	FS	3.1	61	ND	50
BKP-033	4-5 ft	LA	1.7	410		
BKP-033	4-5 ft	FS	1.2	273		
BKP-034	4-5 ft	FS	1.2	156	170	810
BKP-035	4-5 ft	FS	1.2	84		
BKP-036	4-5 ft	FS	2	127		
BKP-037	4-5 ft	LA	6.5	810		
BKP-037	4-5 ft	FS	3.3	264		
BKP-038	4-5 ft	FS	8.6	184		
BKP-039	4-5 ft	FS	6.4	175		
BKP-539	4-5 ft	FS	7.4	165		
BKP-040	4-5 ft	FS	7.8	200		
BKP-041	4-5 ft	FS	1.6	186		
BKP-020A	4-5 ft	FS	6.7	158		
BKP-021A	4-5 ft	LA	8	160		
BKP-021A	4-5 ft	FS	15	183		
BKP-022A	4-5 ft	FS	5.8	243		
BKP-023A	4-5 ft	FS	6.3	166		
BKP-024A	4-5 ft	FS	5.2	99		
BKP-025A	4-5 ft	FS	4.2	172		
BKP-026A	4-5 ft	LA	18	410		
BKP-026A	4-5 ft	FS	17	375		
BKP-027A	4-5 ft	LA	9.7	480		
BKP-027A	4-5 ft	FS	18	365		

TABLE 1
POST-EXCAVATION SAMPLE RESULTS
LEWIS CHEMICAL SITE
HYDE PARK, MASSACHUSETTS

Sample Location ID	Sample Depth BGS	Analysis Type	PCBs (mg/kg)	Lead (mg/kg)	TCE (µg/kg)	PCE (µg/kg)
Site Specific Cleanup Goal for Riverbank:			25	--	--	--
Site Specific Cleanup Goal for Mainland:			50	--	--	--
EPA RML Res:			23	400	240,000	12,000
EPA RML Ind:			94	800	1,200,000	56,000
BKP-032A	4-5 ft	FS	1.6	131		
BKP-033A	4-5 ft	FS	3	156		
BKP-034A	4-5 ft	LA	2.5	160		
BKP-034A	4-5 ft	FS	1.6	127		
BKP-035A	4-5 ft	LA	ND	11		
BKP-035A	4-5 ft	FS	ND	15		
BKP-036A	4-5 ft	FS	4.3	360		
BKP-037A	4-5 ft	FS	2.2	381		
BKP-038A	4-5 ft	FS	3.9	124		
BKP-538A	4-5 ft	FS	5.2	148		
BKP-039A	4-5 ft	FS	5.7	209		
BKP-040A	4-5 ft	LA	14	190		
BKP-040A	4-5 ft	FS	11	181		
EXC-31	4-5 ft	LA	19	330	4,000	18,000
EXC-31	4-5 ft	FS	18	272		
EXC-36	4-5 ft	FS	0.5	51	3,600	7,600
EXC-41	4-5 ft	FS	6.3	41	180	260
EXC-45	4-5 ft	FS	22	107		
EXC-46	4-5 ft	FS	23	427		
EXC-47	4-5 ft	FS	18	110	6,800	6,200
EXC-48	4-5 ft	FS	30	143	680	950
EXC-49	4-5 ft	FS	27	45	2,300	3,200
EXC-50	4-5 ft	FS	4.4	98		
EXC-52	4-5 ft	FS	2.2	275		
EXC-552	4-5 ft	FS	2.8	347		
EXC-53	4-5 ft	FS	38	110		
EXC-54	4-5 ft	FS	26	110		
EXC-55	4-5 ft	LA	31	200		
EXC-55	4-5 ft	FS	28	175		
EXC-555	4-5 ft	LA	19	190		
EXC-555	4-5 ft	FS	23	173		
EXC-56	4-5 ft	FS	37	181		
EXC-57	4-5 ft	FS	29	199		
EXC-58	4-5 ft	FS	14	159		
RP-010	4-5 ft	FS	5.1	270	25,000	6,300
EXC-32	4-5 ft	FS	2.7	34	1,900	330

TABLE 1
POST-EXCAVATION SAMPLE RESULTS
LEWIS CHEMICAL SITE
HYDE PARK, MASSACHUSETTS

Sample Location ID	Sample Depth BGS	Analysis Type	PCBs (mg/kg)	Lead (mg/kg)	TCE (µg/kg)	PCE (µg/kg)
Site Specific Cleanup Goal for Riverbank:			25	--	--	--
Site Specific Cleanup Goal for Mainland:			50	--	--	--
EPA RML Res:			23	400	240,000	12,000
EPA RML Ind:			94	800	1,200,000	56,000
EXC-33	4-5 ft	FS	0.8	40		
EXC-34	4-5 ft	FS	15	11		
EXC-35	4-5 ft	FS	40	13		
EXC-35	4-5 ft	LA	39	6.7		
EXC-37	4-5 ft	FS	2.7	11	ND	ND
EXC-38	4-5 ft	FS	5.3	22	ND	290
EXC-39	4-5 ft	FS	ND	9		
EXC-39	4-5 ft	LA	0.91	8.5	390,000	430,000
EXC-40	4-5 ft	FS	2.7	16		
EXC-42	4-5 ft	FS	0.3	17		
EXC-43	4-5 ft	FS	11	16		
EXC-44	4-5 ft	FS	ND	16		
BKP-028	8-10 ft	FS	0.6	23		
BKP-029	8-10 ft	FS	9.1	8		
BKP-029	8-10 ft	LA	11	3.7		
BKP-030	10 ft	LA	47	11		
BKP-041A	5-6 ft	FS	10	280		
BKP-041A	5-6 ft	LA	11	260		
SP-01*	2-3 ft	LA	31	130	1,600	2,900
SP-02*	2-3 ft	LA	39	480	2,200	5,000
SP-03*	2-3 ft	LA	26	290	560	1000
SP-04*	2-3 ft	LA	47	400	1,200	2,000
SP-05*	2-3 ft	LA	50	520	1,600	2,500
SP-06*	2-3 ft	LA	51	290	1,800	2,700
SP-07*	2-3 ft	LA	48	440	1,700	2,500
SP-09*	2-3 ft	LA	55	350	1,600	2,500
SP-21*	2-3 ft	LA	52	190	940	1,400
LA-01	0-3 in	LA	2.9	160	250	440
LA-02	0-3 in	LA	5.9	260	750	1,000
SP-13	4 ft	FS	3.9			
SP-13	4 ft	LA	7.4			
SP-20	4 ft	FS	ND			
SP-19	4 ft	FS	3.3			
SP-18	4 ft	FS	28			
SP-17	4 ft	FS	6.5			
SP-16	4 ft	FS	0.5			
SP-15	4 ft	FS	9.5			

TABLE 1
POST-EXCAVATION SAMPLE RESULTS
LEWIS CHEMICAL SITE
HYDE PARK, MASSACHUSETTS

Sample Location ID	Sample Depth BGS	Analysis Type	PCBs (mg/kg)	Lead (mg/kg)	TCE (µg/kg)	PCE (µg/kg)
Site Specific Cleanup Goal for Riverbank:			25	--	--	--
Site Specific Cleanup Goal for Mainland:			50	--	--	--
EPA RML Res:			23	400	240,000	12,000
EPA RML Ind:			94	800	1,200,000	56,000
SP-15	4 ft	LA	11			
SP-12	4 ft	FS	ND			
SP-11	4 ft	FS	ND			
SP-111	4 ft	FS	ND			
SP-10	4 ft	FS	1.6			
SP-08	4 ft	FS	12			
SP-14	4 ft	FS	0.6			

Notes:

- 1) ND = Not Detected
- 2) mg/Kg = milligram per Kilogram
- 3) µg/Kg = microgram per Kilogram
- 4) in = inches
- 5) ft = feet
- 6) PCE = Tetrachloroethylene
- 7) BGS = Below Ground Surface
- 8) TCE = Trichloroethylene
- 9) -- = No Site Specific Cleanup Goal was established for these compounds.
- 10) * = Sample location was re-excavated to 4 ft bgs but not resampled due to surrounding PCB levels less than 50 mg/Kg.
- 11) EPA RML Res = US EPA Removal Management Level for Residential Soil in November 2018
- 12) EPA RML Ind = US EPA Removal Management Level for Industrial Soil
- 13) LA = Laboratory Analysis [performed by EPA New England Regional Laboratory (NERL)]
- 14) LS = Laboratory Screening (performed by EPA NERL)
- 15) FS = Field Screening (performed by EPA Mobile Laboratory)
- 16) PCBs = Polychlorinated Biphenyls
- 17) All results for PCBs are the result for the Aroclor Ar-1248.
- 18) All analyses for PCE and TCE were conducted via Laboratory Analysis.
- 19) Samples collected starting at 0 ft bgs are clearance samples; no excavation was conducted at these locations.
- 20) Samples that contain grayed out results were not submitted for that specific analysis.

Appendix D

Waste Disposal Summary Table

WASTE DISPOSAL SUMMARY TABLE
LEWIS CHEMICAL SITE
HYDE PARK, MASSACHUSETTS

Disposal Facility:		Casella NEWSVT Landfill 21 Landfill Lane Coventry, VT	
Transporter:		W.L. French Excavating Corporation	
Description of Materials:		Non-Hazardous, Non-DOT Regulated Solids (Pleather Area Soil and Debris) Profile No. 30756/30758	
Date	# Of Truck Loads	Manifest No.	Weight (tons)
8/28/2023	3	001, 002, 003	95.01
8/29/2023	5	004, 005, 006, 007, 008	151.27
8/30/2023	5	009, 011, 012, 013, 014	151.84
8/31/2023	7	010, 015, 016, 017, 018, 019, 020	223.87
9/1/2023	2	021, 022	65.57
9/5/2023	4	023, 024, 025, 026	132.54
9/6/2023	4	027, 028, 029, 030	124.84
9/7/2023	3	032, 033, 034	94.72
9/8/2023	1	031	34.04
9/11/2023	3	035, 036, 037	93.90
9/12/2023	1	038	31.02
9/13/2023	1	039	31.59
TOTAL			1,230.21
VT = Vermont DOT = Department of Transportation			

WASTE DISPOSAL SUMMARY TABLE
LEWIS CHEMICAL SITE
HYDE PARK, MASSACHUSETTS

Disposal Facility:		Heritage Environmental Services 4370 West County Road Roachdale, IN	
Description of Materials:		UN 3432, Polychlorinated Biphenyls, Solid, Mixture (PCB Remediation Waste)	
Date	Trucking Company	Manifest No.	Weight (tons)
1/23/2024	Goulet	001410001WAS	28.88
1/23/2024	Goulet	001410002WAS	24.09
1/23/2024	Goulet	001410003WAS	34.59
1/23/2024	Goulet	001410004WAS	16.68
1/23/2024	Goulet	001410005WAS	26.60
1/23/2024	Goulet	001410006WAS	26.37
1/23/2024	Goulet	001410007WAS	20.54
1/23/2024	Goulet	001410008WAS	27.10
1/23/2024	Goulet	001410009WAS	28.78
1/24/2024	Goulet	001410010WAS	19.64
1/24/2024	Goulet	001410011WAS	25.94
1/24/2024	Goulet	001410012WAS	26.49
1/24/2024	Goulet	001410013WAS	28.42
1/24/2024	Goulet	001410014WAS	27.62
1/24/2024	Goulet	001410015WAS	27.63
1/24/2024	Goulet	001410016WAS	28.85
1/25/2024	Goulet	001410017WAS	22.10
1/25/2024	Goulet	001410018WAS	27.44
1/25/2024	Goulet	001410019WAS	26.09
1/25/2024	Goulet	001410020WAS	21.44
1/25/2024	Goulet	001410021WAS	27.58
1/25/2024	Goulet	001410022WAS	27.97
1/25/2024	Goulet	001410023WAS	22.87
1/29/2024	Goulet	001410024WAS	27.21
1/29/2024	Goulet	001410025WAS	21.77
1/29/2024	Goulet	001410026WAS	28.48
1/29/2024	Goulet	001410027WAS	24.80
1/29/2024	Goulet	001410028WAS	28.05
1/29/2024	Goulet	001410029WAS	17.19
1/29/2024	Goulet	001410030WAS	19.75
1/29/2024	Goulet	001410031WAS	23.04
1/29/2024	Goulet	001410032WAS	27.81
1/29/2024	Goulet	001410033WAS	22.39
1/29/2024	Goulet	001410034WAS	24.07
1/29/2024	Goulet	001410035WAS	23.86
1/30/2024	Goulet	001410036WAS	20.25
1/30/2024	Goulet	001410037WAS	26.69

WASTE DISPOSAL SUMMARY TABLE
LEWIS CHEMICAL SITE
HYDE PARK, MASSACHUSETTS

Disposal Facility:		Heritage Environmental Services 4370 West County Road Roachdale, IN	
Description of Materials:		UN 3432, Polychlorinated Biphenyls, Solid, Mixture (PCB Remediation Waste)	
Date	Trucking Company	Manifest No.	Weight (tons)
1/30/2024	Goulet	001410038WAS	25.17
1/30/2024	Goulet	001410039WAS	23.75
1/30/2024	Goulet	001410040WAS	22.68
1/30/2024	Goulet	001410041WAS	25.63
1/30/2024	Goulet	001410042WAS	25.90
1/30/2024	Goulet	001410043WAS	20.84
1/30/2024	Goulet	001410044WAS	20.46
1/30/2024	Goulet	001410045WAS	26.09
1/30/2024	Goulet	001410046WAS	26.73
1/31/2024	Goulet	001410047WAS	24.20
1/31/2024	Goulet	001410048WAS	23.08
2/19/2024	Goulet	001410049WAS	35.94
2/19/2024	Goulet	001410050WAS	36.33
2/19/2024	Goulet	001410051WAS	35.13
2/19/2024	Goulet	001410052WAS	35.06
2/19/2024	Goulet	001410053WAS	34.52
2/19/2024	Goulet	001410054WAS	40.47
2/22/2024	Goulet	001410055WAS	35.30
2/22/2024	Goulet	001410056WAS	33.85
2/22/2024	Goulet	001410057WAS	35.32
2/22/2024	Goulet	001394475WAS	35.99
2/22/2024	Goulet	001394476WAS	36.52
2/22/2024	Goulet	001394477WAS	34.19
2/23/2024	Goulet	001394478WAS	33.15
2/23/2024	Goulet	001394479WAS	33.13
2/23/2024	Goulet	001394480WAS	36.03
2/23/2024	Goulet	001394481WAS	35.26
2/23/2024	Goulet	001394482WAS	31.99
2/23/2024	Goulet	001394483WAS	35.58
2/26/2024	Goulet	001394484WAS	33.45
2/26/2024	Goulet	001394485WAS	34.65
2/26/2024	Goulet	001394486WAS	31.87
2/26/2024	Goulet	001394487WAS	34.61
2/26/2024	Goulet	001394488WAS	39.04
2/26/2024	Goulet	001394489WAS	32.65
2/29/2024	Goulet	001394468WAS	32.00
2/29/2024	Goulet	001394469WAS	33.84
2/29/2024	Goulet	001394470WAS	31.90

WASTE DISPOSAL SUMMARY TABLE
LEWIS CHEMICAL SITE
HYDE PARK, MASSACHUSETTS

Disposal Facility:		Heritage Environmental Services 4370 West County Road Roachdale, IN	
Description of Materials:		UN 3432, Polychlorinated Biphenyls, Solid, Mixture (PCB Remediation Waste)	
Date	Trucking Company	Manifest No.	Weight (tons)
4/25/2024	Heritage	001410064WAS	22.24
4/25/2024	Heritage	001410066WAS	27.89
4/25/2024	Heritage	001410058WAS	26.39
4/25/2024	Heritage	001410059WAS	26.84
4/25/2024	Heritage	001410060WAS	26.24
4/25/2024	Heritage	001410061WAS	22.79
4/25/2024	Heritage	001410062WAS	23.92
4/25/2024	Heritage	001410063WAS	25.58
4/25/2024	Heritage	001410065WAS	24.28
4/26/2024	Goulet	001394460WAS	31.39
4/26/2024	Goulet	001394461WAS	32.40
4/26/2024	Goulet	001394462WAS	33.84
4/26/2024	Goulet	001394463WAS	32.19
4/26/2024	Goulet	001394464WAS	31.70
4/26/2024	Goulet	001394465WAS	31.88
4/26/2024	Heritage	001410067WAS	24.41
4/26/2024	Heritage	001410068WAS	24.22
4/26/2024	Heritage	001410069WAS	21.91
4/26/2024	Heritage	001410070WAS	22.30
4/26/2024	Heritage	001410071WAS	22.92
4/26/2024	Heritage	001410072WAS	25.45
4/26/2024	Heritage	001410073WAS	22.06
4/26/2024	Heritage	001410074WAS	20.31
4/26/2024	Heritage	001410075WAS	22.98
4/26/2024	Heritage	001410076WAS	21.91
4/26/2024	Heritage	001410077WAS	24.41
4/26/2024	Heritage	001410078WAS	21.51
4/29/2024	Goulet	001394466WAS	32.46
4/29/2024	Goulet	001394467WAS	33.53
4/29/2024	Goulet	001394471WAS	37.73
4/29/2024	Goulet	001394472WAS	31.31
4/29/2024	Goulet	001394473WAS	32.66
4/29/2024	Goulet	001394474WAS	35.33
4/29/2024	Goulet	001413929WAS	39.35
4/29/2024	Goulet	001413930WAS	31.87
4/29/2024	Goulet	001413931WAS	35.44
4/30/2024	Goulet	001413920WAS	37.70
4/30/2024	Goulet	001413921WAS	33.81
4/30/2024	Goulet	001413922WAS	34.72

WASTE DISPOSAL SUMMARY TABLE
LEWIS CHEMICAL SITE
HYDE PARK, MASSACHUSETTS

Disposal Facility:		Heritage Environmental Services 4370 West County Road Roachdale, IN	
Description of Materials:		UN 3432, Polychlorinated Biphenyls, Solid, Mixture (PCB Remediation Waste)	
Date	Transporter	Manifest No.	Weight (tons)
4/30/2024	Goulet	001413923WAS	34.75
4/30/2024	Goulet	001413924WAS	31.37
4/30/2024	Goulet	001413925WAS	28.72
4/30/2024	Goulet	001413926WAS	36.26
4/30/2024	Goulet	001413927WAS	35.55
4/30/2024	Goulet	001413928WAS	37.90
4/30/2024	Heritage	001410079WAS	24.01
4/30/2024	Heritage	001410080WAS	23.89
4/30/2024	Heritage	001413952WAS	23.28
4/30/2024	Heritage	001413954WAS	22.41
4/30/2024	Heritage	001413953WAS	23.65
4/30/2024	Heritage	001413955WAS	22.90
5/1/2024	Heritage	001413942WAS	23.26
5/1/2024	Franks	001413943WAS	18.47
5/1/2024	Heritage	001413944WAS	22.62
5/1/2024	Heritage	001413945WAS	24.35
5/1/2024	Heritage	001413947WAS	20.28
5/1/2024	Heritage	001413948WAS	23.67
5/1/2024	Heritage	001413949WAS	24.45
5/1/2024	Franks	001413950WAS	34.37
5/1/2024	Franks	001413956WAS	20.99
5/1/2024	Goulet	001413911WAS	38.60
5/1/2024	Goulet	001413912WAS	34.21
5/1/2024	Goulet	001413913WAS	33.60
5/1/2024	Goulet	001413914WAS	38.18
5/1/2024	Goulet	001413915WAS	37.86
5/1/2024	Goulet	001413916WAS	30.87
5/1/2024	Goulet	001413917WAS	33.98
5/1/2024	Goulet	001413918WAS	35.43
5/1/2024	Goulet	001413919WAS	37.90
5/1/2024	Heritage	001413941WAS	21.30
5/1/2024	Heritage	001413946WAS	22.74
5/1/2024	Heritage	001413951WAS	25.39
5/2/2024	Heritage	001413936WAS	22.80
5/2/2024	Heritage	001413937WAS	22.99
5/2/2024	Heritage	001413938WAS	25.57
5/2/2024	Heritage	001413939WAS	22.18
5/2/2024	Heritage	001413940WAS	24.85
6/17/2024	Heritage	001410081WAS	24.73
6/17/2024	Heritage	001410082WAS	28.91
6/17/2024	Heritage	001410083WAS	30.04
6/17/2024	Heritage	001413933WAS	31.25
6/17/2024	Heritage	001413934WAS	24.62
6/17/2024	Heritage	001413935WAS	26.13
TOTAL			4,472.52

IN = Indiana

Goulet = Goulet Tucking Inc

DOT = Department of Transportation

Heritage = Heritage Transport LLC

WTN = Waste Tracking Number

Franks = Franks Vacuum Trucking