



September 9, 2019

Ms. Maria Morelli
Senior Planner
Planning and Community Development Department
Town of Brookline
333 Washington Street, 3rd Floor
Brookline, MA 02445

RE: Environmental Technical Review
Proposed Mixed-Use Development
1299 Beacon Street, Brookline MA

Dear Ms. Morelli:

In August 2019, Fuss & O'Neill received a report, prepared by GEI Consultants (GEI) in reference to environmental testing performed at the 1299 Beacon Street property (hereafter, the Site) in July 2019. GEI performed that testing in order to characterize soil on a preliminary basis as part of the ongoing Zoning Board of Appeal (ZBA) review of a proposed mixed-use development at that location.

As you are aware, the proposed development includes a multi-level underground parking garage and foundation system, which will displace large volumes of soil. As the ZBA considers this proposal, geotechnical and environmental peer review raised questions regarding the logistics of excavation and soil management at the site, including but not limited to questions of soil quality and the potential triggers for "response actions" pursuant to the Massachusetts Contingency Plan (MCP; 310 CMR 40 and MGL 21E).

Summary of Prior Conditions

GEI previously presented testimony and geotechnical reports which characterized an "urban fill" horizon consisting of up to 20 feet of sandy fill material on the property. Frequently, as noted during peer review, "urban fill" is associated with anthropogenic materials (e.g. ash, rubble) which can contain hazardous materials and trigger environmental response actions or complicate soil movement on construction projects. The fill horizon would generally be excavated and disposed as displacement volume for the proposed building foundation and as such, questions arose about the potential process for excavation, handling, and disposal of that material, as it relates to health, safety, and impacts to abutting property owners and residents.

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Summary of Review Findings

In July 2019, GEI performed three soil borings at the Site and collected soil samples for laboratory analysis. The samples included two samples of fill material for volatile organic compounds (VOCs), two samples of fill material for a range of metals, petroleum hydrocarbons, and polychlorinated biphenyls, and one sample of reportedly native soil for the complete suite of testing parameters encompassing the other four samples.

GEI's findings, as summarized in a letter report dated August 2, 2019, indicated that GEI did not identify a reportable concentration in connection with the soil. Trace metals were detected at levels generally consistent with the Massachusetts Department of Environmental Protection (MassDEP) background concentrations, and below the MCP Reportable Concentrations, while acetone was detected at trace levels and was attributed to laboratory cross-contamination. The concentration of acetone only slightly exceeded the laboratory reporting limit, and was less than 1% of the reportable concentration.

Conclusions and Recommendations

Reporting and response actions have not been triggered as a result of the testing performed to date. As noted by GEI, "additional soil sampling and analysis will be necessary to completely characterize all the soil for offsite disposal." Specifically, as noted by GEI and peer review, sampling is generally warranted at a rate of one sample per 500 to 750 tons (350 to 500 cubic yards) for disposal.

We concur with GEI's notation that additional testing will be required, and recommend that the Construction Management Plan for the project include a contingency in the event that contaminated soil is identified. However, based on the information collected to date, the soil conditions are not indicative of a large-scale environmental cleanup being required at the Site, and response actions have not been triggered at this time as a result of the findings.

Sincerely,

Daniel LaFrance, PE, LSP
Project Manager