



352 TURNPIKE ROAD
SUITE 320
SOUTHBOROUGH, MA 01772
508.485.0755
whitestoneassoc.com

September 17, 2019

via email

SULLIVAN & COMERFORD, P.C.
80 Washington Street
Building B
Suite 7
Norwell, Massachusetts 02061

Attention: Mr. Walter Sullivan
Shareholder & Director

**Regarding: ENVIRONMENTAL DOCUMENT REVIEW
EXISTING MIXED RESIDENTIAL & COMMERCIAL BUILDINGS
1309 & 1319 BEACON STREET
PARCEL ID NOs. 161-02-00 & 161-01-00
BROOKLINE, NORFOLK COUNTY, MASSACHUSETTS
WHITESTONE PROJECT NOs.: EM1916629.000 & GM1916630G.M19**

Dear Mr. Sullivan:

Whitestone Associates, Inc. (Whitestone) is pleased to provide this letter summarizing the findings of our review of the March 28, 2019 *Geotechnical / Environmental Technical Review* letter prepared by Fuss & O'Neill for the development project proposed for the property located at 1299 Beacon Street, Brookline, Middlesex County, Massachusetts (development site). Whitestone reviewed the above-referenced report as well as conducted a review of public records available online with the Massachusetts Department of Environmental Protection (MassDEP) with respect to how construction associated with the proposed development may potentially impact the properties located at 1309 and 1319 Beacon Street in Brookline, Middlesex County, Massachusetts (target properties). Whitestone's summary of findings and recommendations with respect to geotechnical issues related to the project are presented under a separate cover for Whitestone project number GM1916630.000.

ENVIRONMENTAL CONDITIONS SUMMARY

Based on our review of the Fuss & O'Neill summary letter and records publicly available with the MassDEP, neither the target properties located at 1309 & 1319 Beacon Street nor the development site located at 1299 Beacon Street are Disposal Sites, as defined by 310 Code of Massachusetts Regulations (CMR) 40.0000, commonly referred to as the Massachusetts Contingency Plan (MCP). However, the development site and target properties are located within an historically developed mixed residential, commercial, and manufacturing area in the Greater Boston Area and multiple Disposal Site were identified within 500 feet of the target properties. The following sections summarize Disposal Sites identified in proximity (i.e., within 500 feet) of the target properties, listed by the release tracking number (RTN) assigned by the MassDEP.

Other Office Locations:

WARREN, NJ
908.668.7777

CHALFONT, PA
215.712.2700

ROCKY HILL, CT
860.726.7889

WALL, NJ
732.592.2101

STERLING, VA
703.464.5858

EVERGREEN, CO
303.670.6905

RTN 3-2048: 1285 Beacon Street

The Disposal Site at 1285 Beacon Street, located approximately 250 feet east of the target properties along Beacon Street, was assigned RTN 3-2048 for the release of petroleum hydrocarbons to site soil identified during underground storage tank (UST) removal activities in September 1987. A Class A-2 *Response Action Outcome (RAO) Statement* was submitted to MassDEP in October 2007, indicating all sources of oil and/or hazardous material (OHM) had been eliminated or controlled and an *Activity and Use Limitation (AUL)* was not required to maintain a condition of “No Significant Risk”. The October 2007 RAO indicated soil impacts were limited to a depth of 15 feet below ground surface (fbgs) and groundwater, documented at a depth of 16 fbgs to 18 fbgs at the time, was not impacted at concentrations above the GW-3 Method 1 Groundwater Cleanup Standards applicable at the time. No evaluation of groundwater flow direction was included in the RAO.

RTN 3-3675: 11 Longwood Avenue

The Disposal site at 11 Longwood Avenue, located approximately 60 feet south-southwest of the target properties, was assigned RTN 3-3675 for the release of petroleum hydrocarbons associated with multiple former USTs at the former Mike’s Texaco filling station in 1987. A Class A-3 RAO with an AUL was submitted to MassDEP in March 1998. At the time the RAO was filed, residual petroleum-impacted soil remained at the site and petroleum light non-aqueous phase liquid (LNAPL) was present on the shallow groundwater table. Groundwater was documented to be present at depths of approximately 27 fbgs to 30 fbgs and flow in generally easterly direction.

RTN 3-15954: 30 Longwood Avenue

The Disposal Site at 30 Longwood Avenue, located approximately 80 feet east-southeast of the target properties across Sewall Avenue, was assigned RTN 3-15954 for the release of petroleum to site groundwater in 1998. A Class B-1 RAO and Downgradient Property Status were submitted to MassDEP in March 1999 indicating that the detected petroleum impacts to site groundwater were attributed to the release at Mike’s Texaco station (RTN 3-3675) and an AUL was not required to maintain a condition of “No Significant Risk”. Groundwater was documented in the 1999 RAO to be present at a depth of approximately 28 fbgs and flow in a southwesterly direction.

RTN 3-17777: 1341 Beacon Street

The Disposal Site at 1341 Beacon Street, located approximately 100 feet west of the target properties along Beacon Street, was assigned RTN 3-17777 for the release of fuel oil to site soil in 1998 during UST closure activities. A Class B-2 RAO and AUL were submitted to MassDEP in December 1999. The RAO documents that petroleum impacts were limited to site soil extending to a depth of approximately 8 fbgs. Groundwater not encountered during response actions. No evaluation of groundwater depth or flow direction was included in the RAO.

RTN 3-20599: 34-36 Webster Street

The Disposal Site at 34-36 Webster Street, located approximately 400 feet southwest of the target properties across Harvard Street and Webster Street, was assigned RTN 3-20599 for the release of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), petroleum hydrocarbon compounds, and metals to site soil to a depth of approximately 15 fbgs associated with historical site operations and the presence of urban fill in 2001. A Class A-2 RAO was submitted to MassDEP in April 2002. The RAO indicated that conditions in soil approached but had not yet achieved “background” and that an AUL was

not required to maintain a condition of “No Significant Risk”. Groundwater was encountered at a depth of approximately 30 fbs and was not impacted by the impacted site soil. Groundwater flow direction was not evaluated in the RAO.

RTN 3-24672: 1284 Beacon Street

The Disposal Site at 1284 Beacon Street, located approximately 250 feet northwest across Beacon Street, was assigned RTN 3-24672 for the release of fuel oil from a 10,000-gallon storage tank located in a vault in the basement of the building. The product was cleaned up under as an *Immediate Response Action* (IRA). Subsequent soil and groundwater sampling indicated the minimal impact to site soil had occurred and groundwater was not impacted at concentrations above the Method 1 Standards applicable at the time. A Class A-2 RAO was submitted to MassDEP in October 2006, indicating that all sources of OHM had been eliminated or controlled and an AUL was not required to maintain a condition of “No Significant Risk”. As groundwater was not impacted with petroleum compounds at concentrations above the applicable standards, no groundwater table elevation of flow evaluation was performed.

RTN 3-25113: 10 Waldo Street

The Disposal Site at 10 Waldo Street, located approximately 250 feet north of the target properties across Beacon Street, was assigned RTN 3-25113 for the release of petroleum oil to site soil during the removal of multiple USTs, aboveground storage tanks (ASTs), and in-ground hydraulic vehicle lifts (IHVLs) in March 2005. A Class A-2 RAO was submitted to MassDEP in October 2005, indicating that all sources of OHM had been eliminated or controlled and an AUL was not required to maintain a condition of “No Significant Risk”. As groundwater was not encountered at the maximum depth of response action of 15 fbs. As such, no groundwater table elevation of flow evaluation was performed.

RTN 3-30852: 1285 Beacon Street

The Disposal Site at 1285 Beacon Street, located approximately 250 feet east of the target properties along Beacon Street, was assigned RTN 3-30852 for an Utility-Related Abatement Measure (URAM) filed with MassDEP on behalf of the Town of Brookline to guide soil excavation and management associated with the installation of a new stormwater drainage line in proximity to two Disposal Sites (i.e., 1285 & 1284 Beacon Street, RTNs 3-24672 and 3-2048, respectively). A URAM *Completion Statement* (URAMCS) was submitted to MassDEP in January 2013 documented soil excavation activities extended to a maximum depth of approximately 9 fbs, describing the management of impacted soil in accordance with provisions of the MCP, and that contamination at the Disposal Site was not exacerbated by URAM activities. No groundwater was encountered during URAM activities.

Environmental Conditions Findings and Recommendations

Whitestone’s review of publicly available records online with the MassDEP identified eight proximal Disposal Sites. Of these eight Disposal Sites, contamination was limited to site soil and did not impact groundwater at five (i.e., RTNs 3-17777, 3-20599, 3-24672, 3-25113, and 3-30852). Whitestone identified three Disposal Sites where groundwater had been previously impacted by petroleum hydrocarbon compounds (i.e., RTNs 3-2048, 3-3675, and 3-15954). In addition, petroleum LNAPL remained present in the subsurface at one Disposal Site (i.e., RTN 3-3675) at the time the RAO was recorded.

Based on Whitestone’s understanding of construction activities associated with the proposed redevelopment of 1299 Beacon Street, excavation dewatering will be required. As summarized under a separate cover, Whitestone understands geotechnical recommendations for the development site include

the installation of either secant pile or slurry walls around the perimeter of the excavations. If the secant pile or slurry walls are installed within the impermeable clay layer present at the terminal depth of excavation and dewatering activities are limited to the groundwater that infiltrates the excavation, significant dewatering is not anticipated to be required and would not have an effect on the target properties. However, if long term dewatering of the excavation without secant pile or slurry walls is implemented, the dewatering activities would have the potential to draw groundwater towards the development site and the westerly adjacent target properties.

Whitestone recommends a groundwater quality assessment be conducted for the target properties to establish baseline groundwater quality conditions prior to the initiation of excavation and dewatering activities at the development site. Groundwater quality data collected to establish baseline conditions would permit evaluation of groundwater quality during construction dewatering activities and following completion of construction with respect to potential degradation of groundwater quality beneath the target properties caused by redevelopment project.

Whitestone appreciates this opportunity to be of continued service to Sullivan & Comerford, P.C. If you have any questions, please do not hesitate to contact us at 508-485-0755.

Sincerely,

WHITESTONE ASSOCIATES, INC.



Daniel P. Gorman, LSP, LEP
Senior Project Manager



Ryan R. Roy, P.E.
Principal, New England Region