Environmental Engineering, Civil Engineering
Forensic Engineering, Construction Services

ADMINISTRATIVE CONSENT ORDER
PROGRESS REPORT
NOVEMBER 2018

Former United Shoe Machinery Division North Parcel
181 Elliott Street
Beverly, MA 01915

Prepared for:

Cummings Properties, LLC
200 West Cummings Park
Woburn, MA 01801

Prepared by:

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December 20, 2018

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1.0 INTRODUCTION

This Progress Report was prepared in order to detail the field and sampling activities associated with the former United Shoe Machinery (USM) Division North Parcel at 181 Elliott Street in Beverly, Massachusetts (also referred to as the "Site"). Actions completed in this report relate to the approved Written Proposal/Sampling and Analysis Plan Revision 2 ("SAP") for the Site dated September 29, 2017. Refer to the attached **Figure 1** for the site locus and **Figure 2** for the site plan.

This Site has been identified in the RCRA 2020 Corrective Action Universe list established by the United States Environmental Protection Agency (EPA). By the year 2020, EPA and the authorized states plan to have largely completed the work of implementing final remedies at all facilities requiring Corrective Action. This Site is listed under site number MAD 043415991 as USM Machinery Division. As part of the RCRA 2020 program, EPA is overseeing an audit of the historical remedial actions conducted at the property by the former property owner, Stanley Black & Decker. EPA Region 1 has been working with the current owner's representative, Cummings Properties, LLC, on this Site since 2009, and in EPA's opinion, more sampling data are potentially needed to, among other things, understand whether vapor intrusion may be impacting indoor air quality and posing a threat to human health.

As part of EPA's audit and review of existing sampling data, EPA requires further examination to determine:

- whether vapor intrusion is occurring at locations identified by EPA, including but not limited to, buildings 100, 500, and 600;
- whether contamination exists in the Shoe Ponds that presents ecological risk to aquatic life;
- whether all underground storage tanks have been removed or properly abandoned, if there are releases to the environment from the tanks, and the nature and extent of any migration of contamination from existing tanks;
- whether residual polychlorinated biphenyl (PCB) contamination exists on the fourth floor of Building 100 (formerly occupied by the North Shore Regional Vocational School) in or proximate to the former machine shop and any other area on-site where PCBs were used/managed/released and/or identified as a contaminant of concern; and

- whether the PCB disposal areas (former chip grind shed and former ballfield area) meet the requirement of 40 CFR § 761.61 and the January 9, 1997 approval letter from EPA, including but not limited to the following:
  (1) required protective cover,
  (2) required cover maintenance,
  (3) required AUL documentation, and
  (4) appropriate documentation to verify that stabilized PCB contaminated soils were placed at least one foot above the high water table so that no migration of PCBs to groundwater is occurring.

These requirements were set forth in an Administrative Consent Order (ACO) between EPA and Cummings Properties, LLC with an effective date of April 13, 2017.

Specifically, this report documents actions that have taken place in November 2018 in furtherance of the work required in the ACO. Work was done in accordance with the SAP, as updated September 29, 2017.

2.0 NOVEMBER 2018 ACTIVITIES

No field sampling was performed in November 2018. There were no scheduled field activities based on the SAP or the Elliott Landing SAP.

Actions taken in November 2018 included the submittal of the October 2018 Progress Report (on November 13, 2018), and, at the request of EPA, the preparation of a letter to Steve Drohosky, General Manager of Cummings Center, for delivery to the child daycare tenant at Suite 135C in Building 100, regarding updates on indoor air sampling, the results of the Risk Characterization, and a potential interior source.

In addition, several actions were taken in reference to the Addendum to the Quality and Assurance Project Plan (QAPP) which included a work plan for the remaining ecological work at the Site. The QAPP Addendum was submitted on October 5, 2018. EPA provided comments on the QAPP Addendum on October 30, 2018. Responses to such comments and a revised QAPP Addendum were submitted on November 13, 2018. Based on a supplemental EPA comment via email, a revised Form L for the QAPP Addendum was submitted on November 14, 2018. An additional email response to additional EPA comments received on November 14, 2018 was submitted on November 20, 2018.

3.0 NEXT SCHEDULED ASSESSMENT ACTIVITIES

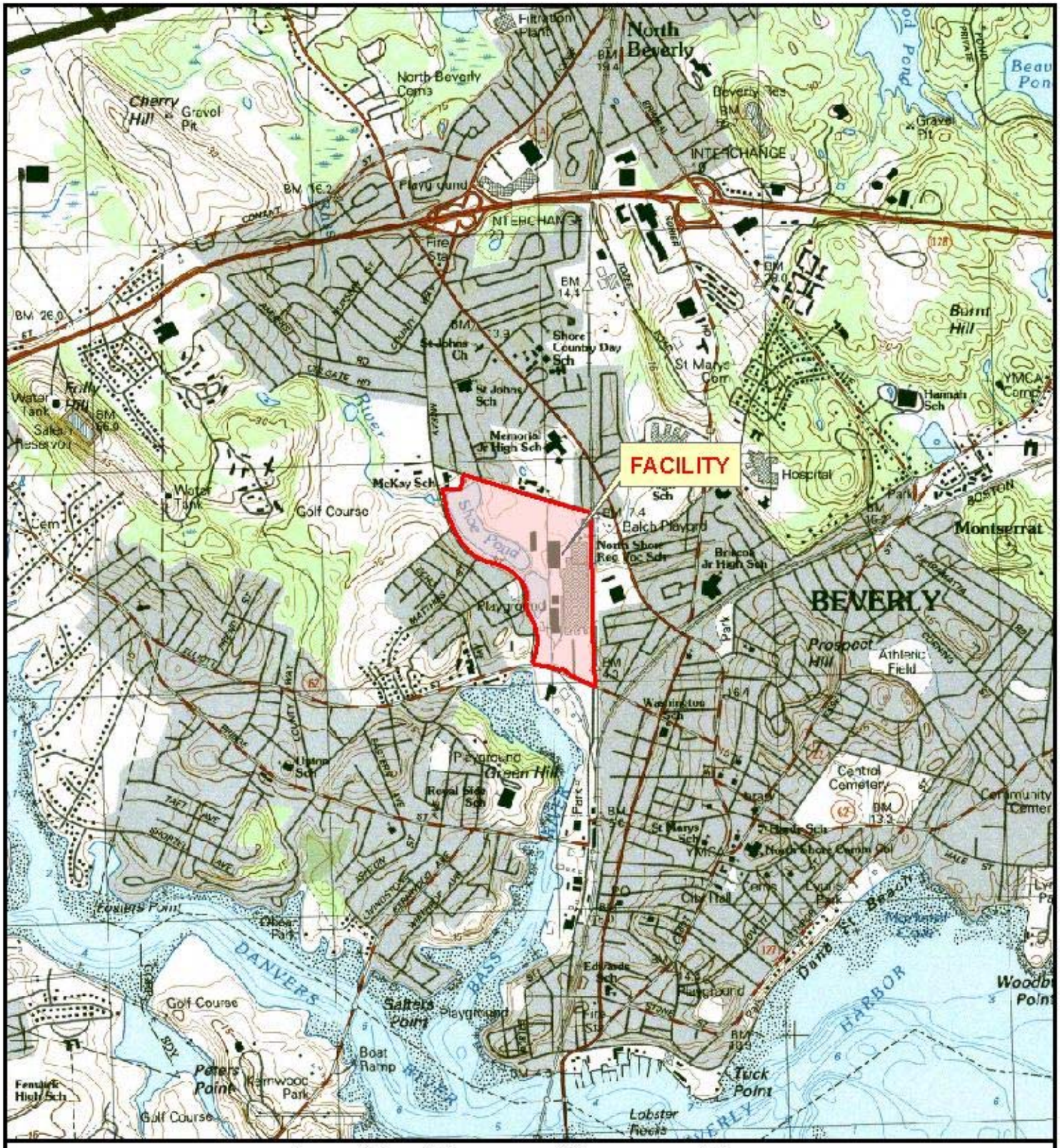
Although there are no scheduled assessment activities in the Site SAP for December 2018, additional indoor air sampling was scheduled to be performed in Building 100 (at Suites 135-C and 140-A) in order

to assess whether and to what extent Suite 140-A might constitute an interior source of contamination at Suite 135-C. Following a Site investigation, modifications were made to the HVAC and ventilation systems at Suite 140-A in an attempt to lower the petroleum hydrocarbon and styrene emissions. Specifically, the exhaust fans serving the processing areas at Suite 140A (one 12-inch duct and one 14-inch duct) were reprogrammed to run on a constant (24 hours a day, seven days a week) basis, even when the manufacturing process is offline, thus creating negative pressure within such area, which is adjacent to Suite 135-C. The scheduled air sampling, which is designed to verify whether contaminant levels have been reduced, took place on December 17-18, 2018. Results of such sampling are expected to be included in the December 2018 Progress Report.

FIGURES

Figure 1 – Locus Plan

Figure 2 – Site Plan



SITE COORDINATES
Longitude: -70.8871 W
Lattitude: 42.5596 N
UTM 4,713,634m N
345,086m E

0 1,000 2,000 4,000 6,000 Feet

Approximate Scale: 1 inch = 2,000 feet (1:24,000)

Figure 1 - Locus Plan

N
W E
S

Project Number: 12201
Client: Cummings

Former United Shoe Machinery North Parcel
181 Elliott Street
Beverly, MA

Created By: EAF Date: 03/15/12
Checked By: BH Date: 03/15/12

Reference: MassGIS USGS Quadrangle: SALEM and MARBLEHEAD NORTH
Image: M/12201_Beverly/2012/Figures

NOTE:
Locations taken from Haley & Aldrich Plan
Dated October 30, 1997.

FIGURE 2

SITE PLAN

FORMER UNITED SHOE
MACHINERY NORTH PARCEL
181 ELLIOTT STREET
BEVERLY MA

LEGEND

STABILIZED SOIL DISPOSAL AREA

TANKS

FSL-X PROPOSED WELL

HISTORIC PHASE II WELL

NORTH

FSL ASSOCIATES
Environmental Engineering & Site Remediation

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SCALE:	1'=125' +/-
DRAWN:	RT
CHK'D:	BAH
DATE:	3/29/17
DATE REV:	3/12/18