

PUBLIC COMMENT DRAFT

**PUBLIC INVOLVEMENT PLAN (PIP)
W.R. GRACE & CO.-CONN.
62 WHITTEMORE AVENUE
CAMBRIDGE, MASSACHUSETTS**

by

**Haley & Aldrich, Inc.
Boston, Massachusetts**

for

**Department of Environmental Protection
Wilmington, Massachusetts**

**File No. 10063-066
June 2006**

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**HALEY &
ALDRICH**

2 June 2006
File No. 10063-066

Department of Environmental Protection
205B Lowell Street
Wilmington, Massachusetts 01887

Attention: Mr. Jack Miano

Subject: W.R. Grace & Co.-Conn.
62 Whittemore Avenue
Cambridge, Massachusetts

Ladies and Gentlemen:

This Public Involvement Plan (PIP) has been prepared for the W. R. Grace & Co. - Conn. Site (RTN # 3-0277) and will replace the December 1995 PIP which addressed public involvement activities through 13 March 2006 when a Class A-3 Response Action Outcome (RAO) Statement was filed. While no further response actions are necessary to maintain a condition of No Significant Risk at the Site, the Grace neighbors and other interested parties have expressed in interest in continuing the public involvement process should post-RAO response actions be undertaken. This revised plan is intended to address that request.

Sincerely yours,
HALEY & ALDRICH, INC.

Jennifer L. Sweet, P.E.
Senior Engineer

William W. Beck, Jr., LSP
Senior Vice President

Enclosures

c: Department of Environmental Protection; Attn: Ms. Patricia M. Donahue
W.R. Grace & Co. - Conn.; Attn: Mr. Robert Jenkins, Ms. Maryellen Johns
PIP Repositories: W.R. Grace & Co.-Conn, Cambridge Main Library, North Cambridge
Library, Cambridge Health Alliance - Cambridge Public Health Department
City Council, City of Cambridge; Attn: Ms. Marjorie Decker
Alewife Neighbors, Inc.; Attn: Mr. Mike Nakagawa
Alewife Study Group; Attn: Mr. Ronnie Miller

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FIGURE 1 - Site Locus

FIGURE 2 - Site and AUL Plan

APPENDIX A - List of Reports and Documents

APPENDIX B - Notification List and Site Mailing List

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1. RESPONSIBLE PARTY INFORMATION

On behalf of W.R. Grace, Haley & Aldrich has overseen assessment programs and response actions at the Site. Pertinent information is as follows:

The **Potentially Responsible Party** completing response actions at the Site is:

W.R. Grace & Co.-Conn.
62 Whittemore Avenue
Cambridge, Massachusetts 02140
Contact: Mr. Robert F. Jenkins
Tel. (617) 498-4476

The **Licensed Site Professional (LSP)** assisting in the completion of the MCP response actions is:

William W. Beck, Jr.
Senior Vice President
LSP#: 1637
Haley & Aldrich, Inc.
465 Medford Street, Suite 2200
Boston, Massachusetts 02129-1400
Telephone Number: (617) 886-7400

The LSP, assigned to the Site at the time of MCP response actions, is responsible for implementing the public involvement activities in this PIP. A notice will be provided to the site mailing list if there is a change in LSP.

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2. DISPOSAL SITE BACKGROUND

2.1 Site Description

The W.R. Grace & Co.-Conn. Disposal Site is comprised of the property located at 62 Whittemore Avenue and the One Alewife Center property, both in Cambridge, Massachusetts ("Site" or "Disposal Site"). The Site location is provided on Figure 1. The Site consists of a 1-acre property known as One Alewife Center (owned by others) and an irregularly shaped, approximately 24-acre property, comprised of 6.5 acres owned by W.R. Grace & Co.-Conn. ("W.R. Grace"), 17.5 acres owned by Alewife Land Corporation. The Site is depicted on Figure 2. The Site is bounded by Whittemore Avenue to the north; residences, Harvey Street and Russell Field to the east; Rindge Avenue to the south; and the Alewife Brook Parkway and an approximately 2-acre parcel located between Jerry's Pond and Alewife Brook Parkway to the west. Property boundaries, on-site structures, and abutting properties are shown on Figure 2.

Currently nine interconnected structures exist on the W.R. Grace portion of the Site, which are used by the W.R. Grace Performance Chemicals as office space and/or research and development (R&D). Currently, the only industrial operations at the Site are conducted in a small machine shop. The machine shop produces equipment for customers that utilize Grace's FDA approved can sealing compounds to seal food and beverage cans. The One Alewife Center building is located at the northwestern corner of the Site and is used for office space. The remainder of the Site is partially covered by landscaped areas, parking areas, an access road to/from Routes 2 and 16, and paved walkways.

The topography is slightly undulating, resulting from the presence of foundations of former buildings, the placement of excess soil generated from demolition and site re-grading activities in the last 20 years, and from remediation activities conducted in the 1980s. Elevations vary from approximately El. 9 to El. 11 National Geodetic Vertical Datum (NGVD). Due to the presence of the Massachusetts Bay Transit Authority (MBTA) Red Line tunnel easement through a portion of the Site, the MBTA datum (-105.9 NGVD) is also frequently applied to the Site.

Jerry's Pond is located on the southern portion of the Site, north of Rindge Avenue (Figure 2). Jerry's Pond is a man made water body, created as a result of clay mining activities in the mid-1800s. Jerry's Pond has no inlet or outlet. Surface water flows into the pond and then recharges the groundwater system in this area. A small retention pond, connected to Jerry's Pond, was created immediately to the north of Jerry's Pond in the late 1970s. The pond was created in connection with dewatering activities during the construction of the Red Line tunnel.

Two ponds, Infield Pond and Parkway Pond, are located immediately to the west, along Alewife Brook Parkway (Route 16). Infield Pond collects surface water runoff from the Site and is connected to Parkway Pond via a below grade pipe. Parkway Pond, located to the south of Infield Pond, also collects surface water runoff, as well as water pumped from sumps in the MBTA tunnel. Parkway Pond is connected via a pipe to Yates Pond, another abandoned clay pit located to the north of Parkway Pond, across Route 16. Water flows from Yates Pond into Alewife Brook.

2.2 Regulatory Status

The following provides a brief summary of recent regulatory history. Detailed site and regulatory history has been provided in various reports and documents previously submitted for the Site. A list of previous reports and documents is provided in Appendix A.

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The Massachusetts Department of Environmental Protection (DEP) RTN for the Site, assigned in 1987, is 3-0277. The Site was granted a Tier IC permit with an effective date of 13 February 1997. A second RTN (RTN 3-17014) was assigned to the Site in June 1998. In July 1999, RTN 3-17014 was closed by the DEP and the compliance obligations for this RTN were incorporated into existing compliance obligations under RTN 3-0277.

An evaluation of risks to human health, safety, public welfare and the environment was completed as a part of the RAO. Results of the risk characterization concluded that a condition of "No Significant Risk" exists under existing conditions however does not exist for all foreseeable future conditions. Therefore, an Activity and Use Limitation (AUL) was required to maintain a condition of "No Significant Risk". Three AULs were prepared as Notices of Activity and Use Limitations with the same permitted and restricted uses and were recorded separately for various parcels of land owned by Grace. AULs were recorded for the Grace properties on 6 March 2006.

The purpose of the AULs is to control potential exposure to the underlying soil. Site uses allowed under the AUL are consistent with the current and reasonably foreseeable uses of the Site and include office, industrial, retail commercial, and research and development ("R&D"), as well as associated grounds-keeping activities, limited excavation and subsurface activities. The AULs requires that the top six inches of surface soil, and existing pavement and concrete slabs, pavement and concrete slab sub-base materials, structures, top soil/loam, landscaping or the like be maintained as "Protective Cover." Prior to the commencement of activities that are likely to disturb the soil below the Protective Cover, Soil Management, Health and Safety, Airborne Asbestos, Dust, Odor Management and Monitoring Plans are to be implemented as appropriate. A Protective Cover Monitoring Plan has been implemented at the Site to monitor the conditions of the Protective Cover.

With the AULs recorded on the deed for the Disposal Site, the risk characterization concluded a condition of "No Significant Risk" of harm to human health, safety, public welfare, and the environment at the Disposal Site for current and foreseeable future use. A Class A-3 Response Action Outcome (RAO) Statement was prepared in accordance with 310 CMR 40.1056(2) of the Massachusetts Contingency Plan (310 CMR 40.0000, MCP) and was submitted to DEP on 13 March 2006.

2.3 Public Involvement History

Between November 1984 and November 1989, twenty-two public meetings were held to inform the public of the progress of the environmental site assessment process and the results of the ongoing investigations. Grace sponsored fifteen of the twenty-two meetings. The data developed during the site investigations was shared with the public during these meetings. Copies of the reports were sent to the North Cambridge Public Library as a reference for the public.

A petition was received by W.R. Grace & Co.-Conn. (Grace) on 5 September 1995, designating the Cambridge facility of Grace as a PIP site. The petition requested a public meeting under Section 14(b) of Massachusetts General Laws Chapter 21E (M.G.L. c. 21E), the State "Superfund" Law, to enable Cambridge residents to participate in decisions relative to response actions at the Grace site at 62 Whittemore Avenue, Cambridge, Massachusetts. Grace designated the site as a PIP site on 25 September 1995 by responding to the petitioners by mail and publishing a Legal Notice in the Cambridge Chronicle on 19 October 1995.

In developing both the draft and final PIP, Haley & Aldrich revisited the site and reviewed available files. Copies of the files are located at the previously established Information Repository at the North Cambridge Public Library.

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The Public Meeting presenting the PIP was held on 2 November 1995 at the W.R. Grace facility at 62 Whittemore Avenue in Cambridge, Massachusetts. Public comments/questions on the draft PIP were submitted to Haley & Aldrich on behalf of W.R. Grace. The PIP was finalized and issued December 1995. Additional public meetings were held by W. R. Grace in October 1998 and in June 1999. Documents, including several RAM Plans, were placed in the designated public repositories for public comment between 1999 and 2004 (see Appendix A).

On 3 December 2004, on behalf of W.R. Grace, a Public Comment Draft Class A-3 RAO Statement prepared by Haley & Aldrich was submitted to DEP and the information repositories. The RAO also included a Draft Activity and Use Limitation (AUL). On 16 December 2004, W.R. Grace hosted a Public Meeting to present the RAO and the AUL. Concerns were raised regarding several provisions in the AUL. In response to those concerns, Haley & Aldrich issued a Revised Draft of the AUL on 19 January 2005 and extended the public comment period for both the RAO and the AUL through 31 January 2005. Subsequent to the public comment period, additional comments and feedback were provided by the community from April through October 2005 through a letter and meeting(s) with the Cambridge City Council, primarily Councilor Marjorie Decker. A Response to Comments was submitted to DEP and the public information repositories on 28 February 2006. The Final AULs were recorded on 6 March 2006 and the Final RAO was submitted to DEP on 13 March 2006. Copies were placed in the information repositories.

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3. ADDRESSING PUBLIC CONCERNS

The original PIP, dated December 1995, was prepared in response to community concerns regarding assessment and remedial response actions conducted under the MCP 310 CMR 40.0000. The PIP provided public involvement opportunities for response actions being conducted at the Site and have included public meetings, public information repositories, public notices, public comment periods with response to comments, and technical assistant grants.

A Class A-3 RAO was submitted to DEP on 13 March 2006. A Class A-3 RAO indicates a condition of "No Significant Risk" exists at the Site under current and foreseeable future conditions as a result of assessment activities and response actions and that a Permanent Solution has been achieved. Additional response actions are not necessary to maintain a condition of "No Significant Risk".

In response to community concerns that public involvement opportunities continue for potential future post-RAO response actions conducted under the MCP, this revised PIP is being implemented. Post-RAO MCP response actions potentially include soil disturbing activities greater than 6 inches below ground surface which would be conducted under a post-RAO Release Abatement Measure (RAM) Plan, Phase IV Remedy Implementation Plan (RIP), or equivalent MCP document. Such documents may include one or more of the following, as applicable: site specific soil management plan, health and safety plan, and an airborne asbestos, dust, odor management and monitoring plan. These plans as well as material changes to the AULs, MCP activities associated with redevelopment activities, and Protective Cover Monitoring Plan (PCMP) Inspection Reports are subject to this PIP. Specific public involvement opportunities for each of these are provided in subsequent sections of this report.

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4. PUBLIC INVOLVEMENT ACTIVITIES

In accordance with 310 CMR 40.1401(1) of the MCP, activities undertaken to involve the public in response actions serve two objectives:

- to inform the public about the risks posed by the disposal site, the status of response actions, the availability of Technical Assistant Grants, and the opportunities for public involvement, and;
- to solicit the concerns of the public about the disposal site and response actions so that, to the extent possible, these concerns can be addressed and incorporated in planning response actions.

To meet these objectives, the PIP provides the following public involvement activities.

4.1 Informing the Public

Grace will provide site-specific information through the established information repositories; developing and maintaining a site mailing list to distribute information about the site; and providing advance notification to local officials and residents about site activities. Grace will provide bound copies of reports and other documents relevant to the Grace site to: DEP, the local information repositories listed below, and to representatives of the neighborhood groups named on the mailing list provided in Appendix B.

4.1.1 Information Repositories

Department of Environmental Protection Northeast Regional File Review Office 205B Lowell Street Wilmington, Massachusetts 01887	Contact: Ms. Holly Migliacci Telephone: (978) 694-3200 File Review Hours: Tues.-Thurs., 9:00 a.m. to 12:00 p.m.
Cambridge Main Library 449 Broadway Cambridge, Massachusetts 02138	Contact: Susan Flannery Telephone: (617) 349-4044 File Review Hours: Mon.-Thurs, 9:00 a.m. to 9:00 p.m., Fri. & Sat., 9:00 a.m. to 5:00 p.m., Sun., 1:00 p.m. to 5:00 p.m.
North Cambridge Library 70 Rindge Avenue Cambridge, Massachusetts 02140	Contact: Matthew Berube Telephone: (617) 349-4023 File Review Hours: Mon., Wed., Thurs., 9:00 a.m. to 8:00 p.m., Tues. & Fri., 9:00 a.m. to 5:30 p.m.
City of Cambridge Cambridge Public Health Dept. 119 Windsor Street Cambridge, Massachusetts 02139	Contact: Sam Lipson Telephone: (617) 665-3838 File Review Hours: Mon. – Fri., 8:30 a.m. to 5:00 p.m.
W.R. Grace & Co.-Conn. 62 Whittemore Avenue Cambridge, Massachusetts 02140	Contact: Robert Jenkins Telephone: (617) 498-4476 File Review Hours: Mon.-Fri., 9:00 a.m. to 4:00 p.m.

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4.1.2 Site Notification List and Mailing List

Haley & Aldrich has established a site notification list and a site mailing list during the course of the public involvement process. The site notification list includes municipal officials within the community (specifically the Chief Municipal Officer and the Board of Health) in accordance with 310 CMR 40.1403. Copies of municipal official notifications will be submitted to DEP. The notification list is provided in Appendix B. Individuals on the notification list will be notified prior to events listed in Section 4.2.3 of the PIP.

The site mailing list includes petitioners, other interested residents, and anyone else indicating an interest in receiving information about the Site, identified at the date of this plan, who requested to be notified of the availability of Site information and documentation. The mailing list is found in Appendix B.

The mailing list will be used to distribute information regarding the availability of documents in the information repositories, notices of public comment periods, and other information about the Grace Disposal Site. Haley & Aldrich will maintain the mailing list of current Local Officials and interested residents. This list will be updated annually in January as a result of changes in elected and appointed officials. Changes in address of interested parties and key contacts in citizen groups will also be made to this list annually in January as provided to Haley & Aldrich by the residents.

4.2 Soliciting Public Input

Grace will provide opportunities for public input regarding Post-RAO response actions planned for the site through public comment opportunities and public meetings as described below.

4.2.1 Public Comment Period

A Permanent Solution has been achieved for the Site and response actions are currently not planned. However, the listing below includes documents which may be prepared for post-RAO response actions if conducted in the future at the Site. If any of the listed documents are prepared for the Grace Site, they will be made available for public review.

Documents available for public comment may include the following, as appropriate:

- RAM Plan or Phase IV RIP which may include one or more of the following, as applicable:
 - Site specific soil management plan (SMP)
 - Health and safety plan (HASP)
 - Airborne asbestos, dust, odor management and monitoring plan
- RAM Completion Report or RIP Completion Statement
- Material changes to the AULs

Grace will provide specific opportunities for the public to submit comments about documents concerning the Site. When key documents are available in draft form, copies of these documents will be distributed to DEP, the Information Repositories, and representatives of the neighborhood groups. A notice of their availability will be sent to individuals identified on the site mailing list. The notice will include the title of the document, where it is available for review, information about how to submit comments to Grace, and the length of the comment period, which will normally be 30 calendar days, but may be longer if warranted by the complexity of a particular document, or if requested by the public. Haley & Aldrich will be responsible for

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providing copies to the Information Repositories and to the DEP site file, as well as sending out notices of availability of any documents Grace prepares. Site specific plans (e.g., SMP, HASP, airborne asbestos, dust, odor management and monitoring plans) will be provided for public comment for the initial development of such plan. Subsequent uses of the plans, for the same type of activities for which they were developed, will not be re-issued for public comment.

4.2.2 Response to Comments

Haley & Aldrich will prepare a summary of all comments received from the public and the responses provided by Grace to these comments. A copy of the response summary will be placed in the Information Repositories and the DEP site file within 60 calendar days of the close of the comment period. Haley & Aldrich will also send a notice of availability of the response summary to individuals identified on the mailing list.

4.2.3 Notification to Local Officials and Residents of Specific Milestones and Events

Notification of specific planning and implementation milestones at the Site will be provided to local officials and interested residents. A Class A-3 RAO, Permanent Solution, has been achieved for the Site. Post-RAO response actions will be implemented under a Release Abatement Measure (RAM) Plan or Phase IV Remedy Implementation Plan (RIP).

Field work associated with post-RAO response actions will be conducted following preparation and comment period of a RAM Plan or RIP. Notification of field work at the Grace site will include information on the type of work and its approximate duration. Notification will be made by Grace to the people on the notification list orally or in writing at least 7 calendar days before activity is scheduled to begin. Notification times for implementation of other remedial actions will be conducted in accordance with 310 CMR 40.1403(3). In addition, the City of Cambridge Fire and Police Departments will be notified if situations exist where public safety is a concern.

4.2.4 Public Meetings

Public meetings will be held for the following purposes:

- Material changes to the AULs
- MCP activities associated with redevelopment activities

Haley & Aldrich will send notices announcing the public meetings to individuals on the site mailing list. Haley & Aldrich will prepare meeting minutes, submit the minutes to DEP, and place a copy of the minutes in the Public Information Repositories. No public meetings are anticipated at this time.

4.2.5 Technical Assistance Grants

Technical Assistant Grants are not available for sites where a Class A or B RAO has been submitted to DEP (310 CMR 40.1452(7)).