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# REPORT

## **PUBLIC INVOLVEMENT PLAN**

CONWAY PARK DISPOSAL SITE  
RTN 3-34868  
550 SOMERVILLE AVENUE  
SOMERVILLE, MASSACHUSETTS

PREPARED BY:

**WESTON & SAMPSON**

July 20, 2019

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## 1.0 INTRODUCTION

### 1.1 General

On May 21, 2018, the City of Somerville (the City) received a petition from Arthur Lambert, Alyssa Napoleon, Alex Radunsky, Christine Guth, Claudia Murrow, Catherine Smart, Derek Neilson, Lobsang Choedar, Maurice Smith, and Marlene Wicherski, all residents of the City of Somerville. The petition requested that the Conway Park disposal site be designated as a Public Involvement Plan (PIP) site, under Section 14 (b) of Massachusetts General Laws chapter 21E (M.G.L. c. 21E), the State "Superfund" Law. The Conway Park disposal site, subject to the PIP request, is tracked by the Massachusetts Department of Environmental Protection (MassDEP) under Release Tracking Number (RTN) 3-34868.

In June of 2018, the City sent a response to petitioners indicating that Conway Park was not yet eligible for a PIP as it did not meet the criteria in Section 310 CMR 40.1401 (1) to (3) of the Massachusetts Contingency Plan (MCP; 310 CMR 40.0000). On March 28, 2019, the City submitted a Phase I Initial Site Investigation (ISI) Report and Tier Classified the Site as a Tier II disposal site. Following Tier Classification, the Conway Park site was officially designated as a Public Involvement Plan (PIP) site on that date, requiring the preparation and implementation of a PIP.

This Plan has been prepared by the City in accordance with the requirements of the Massachusetts Contingency Plan (MCP), 310 CMR 40.0000. The Conway Park disposal site is a Tier II site. The Massachusetts Department of Environmental Protection (MassDEP) has identified the City as a Potentially Responsible Party (PRP); therefore, it is the responsibility of the City to conduct both technical and public involvement activities at the Conway Park disposal site. MassDEP retains the authority to ensure that public involvement activities are conducted in accordance with state law and regulations.

### 1.2 The MCP and the PIP Process

The Massachusetts Contingency Plan, under the authority of M.G.L. c. 21E, is the body of regulations that addresses environmental releases in Massachusetts. The MCP, together with associated Policies, Technical Updates, and Guidance Documents govern and inform assessment and remediation activities for releases of oil and hazardous materials (OHM) that may or may have impacted the environment. The MCP is applicable to any person or entity required to notify MassDEP of a release of OHM, as defined by MGL Chapter 21E, including the owner of a property at which a release has occurred. In this case, the City is the owner of the Conway Park disposal site, at which a release of OHM has been identified.

As the property owner, the City is required to hire a qualified environmental professional, licensed by the Commonwealth, called a Licensed Site Professional (LSP) to ensure compliance with the MCP and provide guidance for response actions. An LSP is licensed based on education, experience, and the satisfactory completion of an examination. Weston & Sampson is under contract to provide LSP services to the City for the Conway Park disposal site. More information on the LSP Program can be located at <https://www.mass.gov/how-to/hiring-a-licensed-site-professional> and <https://www.lspa.org/what-is-an-lsp>.

The MCP requires that response actions be conducted to address release conditions at disposal sites. These response actions include assessing the source, nature and extent of the contamination; identifying the risk posed by the disposal site; and evaluating whether cleanup actions are necessary to reduce risk and, if necessary, determining and implementing the most appropriate remedial actions. In addition, the remedial response action process provides opportunities for public involvement during the cleanup process.

Public involvement during the remedial response action process is undertaken to ensure that the public is both informed of and has the opportunity to comment on the planning for assessment and/or remedial response actions. For those disposal sites at which the public has indicated an interest in becoming involved in this process, the sites are designated as a PIP site. The PRP is required to prepare a plan that identifies specific activities that will be undertaken to address public concerns to the extent possible.

This draft PIP has been prepared by the City and will be reviewed by the public and revised based on comments submitted. The final PIP will be implemented in conjunction with the development and implementation of remedial response actions for the disposal site. The City will implement the public involvement activities described herein at the Conway Park disposal site, in addition to the regular Conway Park updates that are regularly posted on the City's website.

This document is the proposed Public Involvement Plan for the Conway Park disposal located at 550 Somerville Avenue in Somerville, Massachusetts (the Site). Section 2 contains background information on the Site; including Site, environmental assessment, and public involvement histories. Section 3 explains how the remedial response action process addresses community concerns that have been raised during the development of the Plan. Section 4 explains the proposed public involvement activities. Section 5 contains a schedule for public involvement activities. Section 6 outlines the roles and responsibilities of those involved in implementing the Public Involvement Plan. It also explains the procedures MassDEP will use to address situations in which the agency receives complaints about the manner in which the Plan is being implemented. Section 7 describes how the Plan will be revised in the future. This draft Plan will be presented by the City at a public meeting on Wednesday, May 29, 2019, at 6:00 PM at the Somerville Public Safety Building located at 220 Washington Street in Somerville, Massachusetts. Comments on the draft Plan are encouraged and may be submitted at the meeting or by writing to:

Vithal Deshpande  
City of Somerville Environmental Coordinator  
Office of Sustainability & Environment  
93 Highland Avenue  
Somerville, Massachusetts 02143  
[vdeshpande@somervillema.gov](mailto:vdeshpande@somervillema.gov)  
617-625-6600 x5070

Comments should be submitted by close of business, June 19, 2019. As described in Section 4.1, copies of the Draft PIP will be uploaded to the City's website, and made available in the public repositories.

## 2.0 SITE BACKGROUND

### 2.1 Site Description and History

The rectangularly shaped Site consists of a single parcel of land totaling approximately 2.8 acres. The Site is located on the southern side of Somerville Avenue in Somerville, Massachusetts, and was formerly part of the Middlesex Bleachery and Dye Works complex, which included the Site and the abutting parcels to the west. The original complex was subdivided in the mid-1900s.

The northern portion of the Site abuts Somerville Avenue and is developed as a playground (the Playground), and the remainder of the Site south of the Playground, is developed as ballfields (the Ballfield). The Playground includes a mulched area with a playset; hardscape that includes a concrete sitting area, path and circular splash pad; grassy areas surrounding the splash pad; and a small concession stand that straddles the western property line. The Ballfield comprises the remainder of the Site and includes two baseball diamonds, one at the northeast corner and one at the southwest corner. The majority of the remainder of the Ballfield is grassy with trees lining the eastern and western property lines. A fence surrounds both the Ballfield and Playground, and separates the two areas.

The topography of the Site is generally flat within the perimeter fence, with a slope to the south, toward the adjacent Fitchburg Main Line railroad right-of-way (FML). The FML is an active commuter rail line managed by the Massachusetts Bay Transportation Authority (MBTA), and is approximately 5-8 feet lower than the Ballfield elevation. Outside the perimeter fence to the south, an elevation change of several feet is achieved by a combination of a steep slope and a block retaining wall. The Site is higher in elevation than properties located immediately to the east as well, and the grade change is achieved by a poured-in-place concrete retaining wall. Specifically, Allen Court and the residences located east of the Site are approximately 8 feet lower in elevation than the Ballfield.

According to a March 2000 report developed by a historical preservation consultant, titled Historical Report of Conway Park (the Historical Report), a bleachery/dye works occupied at least some portion of Conway Park as early as 1801. Historical Sanborn® Fire Insurance maps confirm the Site was occupied by the Middlesex Bleachery and Dye Works in 1888 and the K.M. Gilmore and Co. Bleach, Dye and Print Works in 1900 and 1934. The extent of the former bleachery stretched beyond the bounds of the Site from 1888 to 1934 to the property immediately west of the Site, now developed as the Veterans Memorial Ice Rink. Numerous buildings with varied uses were located on-Site during this period, and a rail spur connected the Site to the FML. The Historical Report indicates that the primary industrial use at the bleachery slowly shifted from bleachery and dye works to textile printing into the early 20th Century, and ultimately the facility closed sometime between 1931 and 1934. The bleachery buildings were demolished sometime between 1938 and 1943.

Later Sanborn® maps from 1950 to 1991 depict the Site as vacant land. A playground is labeled in the 1989 and 1991 maps in the area immediately west of the Playground, north of the Veterans Memorial Rink. Residences appear adjacent to the southeast of the Site in Sanborn® maps from 1888 to present day, with some retail shops appearing sporadically in the maps. Residences started appearing north of the Site (across Somerville Ave) as early as 1900.

The Historical Report, supported by newspaper clippings dated 1943, indicates that the Site has remained a park since the early- to mid-20th Century. Historical aerial photos of the Site show major

reconfigurations between 1969 and 1970 (Veteran's Memorial Rink built adjacent to Site), between 1970 and 1978 (baseball diamonds constructed in northwest and southeast corners of the Ballfield), and between 1995 and 2008 (baseball diamonds constructed in northeast and southwest corners of the Ballfield). The current configuration of the Site, both the Playground and the Ballfield, has been unchanged since the last major renovation in 1999 to 2001. The grade of the southern portion of the Site was raised sometime between the demolition of the bleachers buildings (late 1930s to early 1940s) and the current configuration of the Ballfield. It is not possible to further narrow the timeline of emplacement of fill at the Site with certainty from the public historical record; however, based on its location close to the FML right-of-way, it is likely that the elevation of southern portion of the Site was raised prior to the construction of the southeast baseball diamond (present from 1970 to 1978).

## 2.2 Environmental Assessment

Elevated concentrations of metals, polycyclic aromatic hydrocarbons (PAHs), and PCBs were initially identified during a Site investigation completed by Weston & Sampson in October and November of 2017. Investigations by Weston & Sampson conducted throughout 2018 confirmed the presence of elevated concentrations of PCBs in soil throughout the Site. Further details of the investigations described below, such as figures, tables, and supporting documentation, are included in the Phase I ISI and Tier Classification Report submitted for the Site on March 28, 2019, which is available to view at the repositories identified below in Section 4.1, and on the MassDEP's online "Searchable Sites" database (<https://eeonline.eea.state.ma.us/portal#!/wastesite/3-0034868>).

### 2.2.1 Initial Environmental Site Assessment - October/November 2017

Weston & Sampson conducted an initial investigation of the Ballfield in October and November of 2017 as part of planning for a retaining wall project in the southeastern corner of the Site and in advance of park redesign. The October/November 2017 subsurface investigation included the advancement of eight soil borings using direct-push technology, eight soil borings using hollow-stem auger methods, and the excavation of two test pits. The initial investigation identified concentrations of PAHs equal to or above MassDEP Reportable Concentrations in 11 of 21 samples submitted for laboratory analysis. Additionally, one sample, collected as a composite of three approximately 20-foot soil borings, proximate to the retaining wall in the southeast corner of the Ballfield, contained a concentration of PCBs above the Reportable Concentration.

### 2.2.2 Supplemental Environmental Site Assessment - March 2018

Following the detection of Reportable Concentrations of contaminants, including PCBs, at the Site, Weston & Sampson conducted a supplemental investigation in March 2018. The purpose of supplemental investigation was to further examine the nature and extent of lead and PCBs across the Site, and to determine if impacts to soil existed within the Playground, which was not considered in the October/November 2017 investigation.

On March 7, 2018, Weston & Sampson oversaw the advancement of fourteen soil borings at the Site: two within the Playground and twelve within the Ballfield. Soil borings were advanced using direct-push technology to depths of approximately 15 feet below ground surface (bgs). Four of the 14 borings, one in each corner of the Site, were completed as groundwater monitoring wells.

Lead in soil was detected in all 28 samples submitted for laboratory analysis. PCBs were detected in seven of the eight locations sampled, including one sample collected from 0 to 3 feet bgs within the

Playground. Seven of the samples analyzed contained PCB concentrations in excess of the Method 1 Cleanup Standard.

Because PCBs and lead were detected at high concentrations in the 0- to 3-foot bgs depth interval, Weston & Sampson remobilized to the Site on March 26, 2018, to determine if high concentrations of PCBs existed in the surficial, 0- to 1-foot depth interval. This surficial soil sampling included twenty-one soil borings, advanced using a stainless-steel hand auger to a depth of approximately 1-foot bgs. Of the 21 soil borings, eight were located within the Playground and thirteen were located within the Ballfield. One sample was collected from each of the 21 soil borings from the 0- to 1-foot bgs depth interval. In the case of the Playground, three surficial samples were not analyzed for lead because the 0- to 1-foot bgs depth interval was not soil, but bark mulch.

Lead was detected in all five of the soil samples submitted from within the Playground. PCBs were detected in five of the eight samples submitted for analysis, including two concentrations in excess of the Method 1 Cleanup Standard.

Within the Ballfield, lead was detected in all thirteen of the soil samples submitted for analysis. PCBs were detected in eleven of the thirteen samples submitted for analysis from within the Ballfield. Nine of the detections were in excess of the Method 1 Cleanup Standard.

On March 15, 2018, Weston & Sampson collected groundwater samples from four on-site monitoring wells. The samples were collected in accordance with EPA low flow guidelines and analyzed for dissolved MCP 14 metals (antimony, arsenic, barium, beryllium, cadmium, chromium, lead, mercury, nickel, selenium, silver, thallium, vanadium, and zinc), extractable petroleum hydrocarbons (EPH), and volatile organic compounds (VOCs). Groundwater samples collected showed that contaminant concentrations were either not detectable or detected below the applicable groundwater standards.

### 2.2.3 Environmental Site Assessment – July 2018

Weston & Sampson performed an Environmental Site Assessment in July 2018 to further assess the nature and extent of PCBs and lead throughout the Site. The assessment included the advancement of 91 additional soil borings, including 17 within the Playground and 74 within the Ballfield, as well as the collection and analysis of 708 soil samples and 7 concrete samples.

#### Soil Boring Advancement and Sample Collection

Soil borings were advanced using direct-push technology to depths of approximately 3.5 to 17.5 feet bgs, with each boring reaching bottom of the fill material. Borings were located in an approximately 50-foot grid across the Site, with a higher resolution, 25-foot grid within the two baseball diamonds, and a 10-foot grid surrounding B-105, where PCBs were detected at a concentration of 5,900 mg/kg. Based on conversations with EPA and MassDEP, samples were collected from each boring at the following depth intervals: 0-½ feet, ½ - 1.5 feet, 1.5 – 2.5 feet, 2.5 – 3.5 feet. If native material was not encountered at 3.5 feet bgs, sample collection continued in 2-foot increments until native material was encountered (i.e., 3.5 – 5.5 feet, 5.5 – 7.5 feet, etc.). Decontamination procedures using a triple-wash of Alconox, hexane, and deionized water were conducted after the advancement of each section of 5-foot tooling. Samples were placed in new, laboratory-prepared bottles and submitted to Con-Test for analysis of PCBs using Soxhlet extraction. Additionally, all samples collected within the Playground and 351 of the samples collected with the Ballfield were analyzed for lead.

### Concrete Sample Collection

Concrete samples were collected in accordance with EPA's Standard Operating Procedure for Sampling Porous Surfaces for PCBs within the Playground. The concrete samples were placed in new, laboratory-prepared bottles, and submitted to Con-Test for analysis of PCBs using Soxhlet extraction.

### Environmental Assessment Results

#### *Playground*

Laboratory analytical results from the July 2018 investigation show PCB concentrations in soil above the laboratory reporting limit at 11 of the 17 soil boring locations within the Playground. PCB concentrations at six of the eleven locations are greater than the Method 1 Cleanup Standard. All of the locations with Method 1 Cleanup Standard exceedances are on the eastern portion of the Playground in the grassy area. No samples collected from the northwestern portion of the Playground show PCB concentrations above the Method 1 Cleanup Standard. Lead was detected in all samples submitted. Lead concentrations exceeded the Method 1 Cleanup Standard in only two samples, which were collected from the eastern portion of the Playground.

PCBs were not detected above the laboratory reporting limits in any of the seven concrete samples collected and analyzed.

#### *Northwestern Portion of the Playground*

A risk characterization was conducted for the northwestern portion of the Playground to evaluate if it was safe for public use. The risk characterization compared data to applicable standards that have been developed to be protective of human health and the environment. Weston & Sampson calculated Exposure Point concentrations for PCBs and lead using an average and a maximum concentration from all data (northwestern portion of the Playground only).

The results of the risk characterization showed that none of the data for the northwestern portion of the Playground exceeded the Method 1 Cleanup Standards at any location. The concentration in one lead sample was equivalent to but did not exceed the standard. For PCBs, the maximum concentration detected in the northwest portion of the Playground was less than the MCP Method 1 and Toxic Substance Control Act (TSCA) cleanup standard. It should be noted that other metals and polycyclic aromatic hydrocarbons (PAHs) were also detected in soil in the northwestern portion of the Playground at concentrations that are less than MassDEP background concentrations; these constituents were not evaluated further.

Based on these data, on October 22, 2018, we recommended removing the fence to open up the northwestern portion of the Playground and to allow the public to access that portion of the Site only. EPA and MassDEP were in agreement with our recommendation. The City also put down fresh mulch on top of existing mulch. The Playground was re-opened in the above-mentioned capacity on October 31, 2018.

### Ballfield

Laboratory analytical results from within the Ballfield collected during the July 2018 investigation show PCB concentrations in soil meeting or exceeding the Method 1 Cleanup Standard in 204 of 611 soil samples analyzed. PCBs were not detected above the Method 1 Cleanup Standard below 11.5 feet.



Lead was detected in all 351 samples analyzed. Lead concentrations exceed the Method 1 Cleanup Standard in 88 samples (approximately 25%).

#### 2.2.4 Groundwater Sampling – November 2018

On November 21, 2018, Weston & Sampson collected groundwater samples from the 4 on-site monitoring wells. The samples were gathered in accordance with EPA low flow guidelines and analyzed for PCBs. Samples were placed in new, laboratory-prepared bottles and submitted to Con-Test for analysis. Groundwater samples collected from the four monitoring wells showed that contaminant concentrations were not detectable.

#### 2.2.5 Geophysical Survey – January 2019

On January 7, 2019, Hager-Richter Geoscience of Salem, New Hampshire (HRG), under the oversight of Weston & Sampson performed a geophysical survey on the southern portion of the Ballfield, which shows the highest concentrations of PCBs in soil. The geophysical survey was conducted using three, complementary investigative tools: time domain electromagnetic induction metal detection (EM), magnetic surveying (Mag), and ground penetrating radar (GPR), with the objective of identifying possible sources of PCB contamination in the sub surface (e.g., USTs, drums, transformers, etc.).

The geophysical survey concluded the following:

- USTs or buried drums were not detected in the surveyed area
- Several areas of buried metal were detected as shallow as 3 to 4 feet of the ground surface, including a large area of buried metal on the first baseline of the southern baseball diamond
- Multiple small, non-metallic objects were detected throughout the surveyed area

Based on the results of the geophysical survey, further investigation is necessary to determine the nature and extent of the large area of metal along the southern baseball diamond's first baseline; however, no definitive source for the widespread PCB impacts at the Site was identified.

#### 2.2.6 Phase I ISI and Tier Classification – March 2019

As previously stated, the assessment activities described above were first presented in the Phase I ISI and Tier Classification Report submitted for the Site on March 28, 2019, which is available to view at the repositories identified below in Section 4.1, and on the MassDEP's online "Searchable Sites" database (<https://eeaonline.eea.state.ma.us/portal#!/wastesite/3-0034868>).

### 2.3 Public Involvement History

Since identifying impacts to soil at the Site, the City has held two informational sessions to present the status of Site assessment. The informational sessions, held on March 29, 2018 and December 5, 2018, were televised via public access television and are available for viewing on the City's dedicated Conway Park webpage ([www.somerville.gov/conway](http://www.somerville.gov/conway)). The Conway Park webpage also includes regular updates, downloadable documents, contact information, and the ability to sign up for updates via an email list.

On May 21, 2018, the City received a petition from Arthur Lambert, Alyssa Napoleon, Alex Radunsky, Christine Guth, Claudia Murrow, Catherine Smart, Derek Neilson, Lobsang Choedar, Maurice Smith, and Marlene Wicherski requesting that the Conway Park disposal site be designated a PIP site, in accordance with M.G.L. c. 21E. On April 12, 2019, the City formally responded to the petition, designating the site as a PIP site. This initial letter was resent to two petitions on April 17, 2019 to correct an address change.

In developing this proposed PIP, the City requested input from petitioners in the initial PIP response sent in May, and again in letters dated May 10, 2019 and May 20, 2019. To date the City has received no response from petitioners. Because the City received no responses to the letters sent in April and May, interviews were not conducted prior to preparing this Draft PIP. The public concerns presented in Exhibit I are summarized based on feedback and questions received at public meetings held by the City prior to the PIP designation.

### 3.0 ADDRESSING PUBLIC CONCERNS

The process for assessing and cleaning up disposal sites as set forth in the Massachusetts Contingency Plan (310 CMR 40.0000), is designed to address the effects of the Site on health, safety, public welfare, and the environment. Once a release of oil or hazardous materials has been Tier Classified at a disposal site (Phase I of the remedial response action process), the process proceeds to:

- Comprehensive field investigation of the nature and extent of the contamination and an evaluation of any risks posed to the public and the environment from the site (Phase II);
- Identification and evaluation of remedial response action alternatives and selection of feasible measures that will achieve a permanent cleanup at the site (Phase III);
- Implementation of the selected remedial response actions (Phase IV and Phase V); and,
- Achieving a Permanent or Temporary Solution.

Note that, so long as risk has been reduced or otherwise mitigated to the degree required by the MCP, a Permanent or Temporary Solution may be submitted during any phase described above.

Physical work at a disposal site includes sampling and other environmental field testing, and the implementation of the selected response actions. It may also include the implementation of measures designed to stabilize conditions at the site to implement risk reductions measures, and to prevent the continued migration of contaminants until planning for remedial response is underway (i.e., Immediate Response Measures or Release Abatement Measures).

At each step of the remedial response action process, plans for work are developed, the work is conducted, and reports describing results and recommendations for the next step are prepared. The documents that describe each of these steps are the cornerstone of the remedial response action planning process, since they provide the information necessary to make decisions about how a site should be cleaned up.

As noted in Exhibit I, the public has raised a number of concerns about the Conway Park disposal site. The remedial response action planning process is designed to address the concerns about the nature and extent of contamination; risks posed by the Site to health, safety, public welfare, and the environment; and the adequacy of proposed cleanup measures. These concerns will primarily be addressed as the assessment and remedial planning process unfolds.

## 4.0 PUBLIC INVOLVEMENT

In accordance with the MCP (310 CMR 40.1400), activities undertaken to involve the public in response actions serve two purposes:

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

To meet each of these objectives, the City proposes to undertake specific activities during the remedial response process at the Conway Park disposal site. These activities are described below.

### 4.1 Information Repositories

Publicly Available Site Files: A file on the Conway Park disposal site is maintained at the Northeast Regional MassDEP Office (NERO). The file will contain all documents pertaining to the site with the exception of any enforcement-sensitive material. Appointments to view the site files can be made by contacting NERO directly at 978-694-3320, by mailing a request to NERO at 205B Lowell Street, Wilmington, Massachusetts, 01887, or by filling out the electronic form located online at <https://www.mass.gov/forms/massdep-northeast-region-file-review-public-records-request-form>. As previously mentioned, documents submitted to MassDEP can also be reviewed at MassDEP's online "Searchable Sites" database (<https://eeaonline.eea.state.ma.us/portal#!/wastesite/3-0034868>).

Local Information Repositories: The City will establish and maintain local information repositories to provide Somerville residents with easy access to information about the Site cleanup process and results of Site investigations. The Site information repositories will contain a complete copy of the MassDEP site file including: the Phase I ISI and Tier Classification Report; work plans; sampling and field testing plans; technical reports and documents summarizing results and recommendations; relevant correspondence; press releases; public information materials; the Public Involvement Plan; public meeting summaries; summaries of responses to comments received; and copies of public notices about the disposal site. Information will be sent to the repository by the City as it is developed.

The information repositories for the Site are located at the three branches of the Somerville Public Library:

Central Branch  
79 Highland Avenue  
Somerville, Massachusetts 02143

West Branch (Tufts Administration Building)  
167 Holland Street, 2nd floor  
Somerville, Massachusetts 02144

East Branch

115 Broadway  
Somerville, Massachusetts 02145

Phone (617) 623-5000

Web site: <https://www.somervillepubliclibrary.org/>

As requested by the City, electronic copies of documents subject to the PIP will be provided for upload to the City's dedicated Conway Park webpage ([www.somerville.gov/conway](http://www.somerville.gov/conway)).

#### 4.2 Site Mailing List

The City will establish a mailing list for the Conway Park disposal site. The site mailing list will include: petitioners, interested residents, site abutters, local news media, municipal officials, state legislators, MassDEP site file, and anyone else indicating an interest in receiving information about the Site. The mailing list will be used to announce upcoming public meetings, distribute fact sheets, notices of public comment periods on and the availability of documents in the information repositories, and any other information about the Conway Park disposal site. The City will maintain the mailing list and update it as necessary. The City will provide MassDEP with a copy of the site mailing list.

Anyone wishing to be added to the mailing list can contact:

Vithal Deshpande  
City of Somerville Environmental Coordinator  
Office of Sustainability & Environment  
93 Highland Avenue  
Somerville, Massachusetts 02143  
[vdeshpande@somervillema.gov](mailto:vdeshpande@somervillema.gov)  
617-625-6600 x5070

#### 4.3 Notification of Major Milestones and Events

The Massachusetts Contingency Plan requires community notification (310 CMR 40.1401) of major planning and implementation milestones at regulated sites. Major milestones include:

- The implementation of any Immediate Response Actions (IRAs) for imminent hazards
- The implementation of any Release Abatement Measures (RAMs)
- The use of respirators or level A, B, or C protective clothing
- Residential sampling
- Phase IV remedial action
- The completion of each phase of remediation process including:
  - IRA Completion Statement for imminent hazards
  - Each phase (e.g. Phase II, III)
  - Permanent or Temporary Solution Statements
  - Activity and Use Limitations (AUL)
  - Downgradient Property Status (DPS)

Notification of field work will include information on the type of work and its approximate duration. Notification will be made by the City to the people on the Notification List by telephone the day before

activity is scheduled to begin. Notification at the end of a remedial phase will include a summary of the phase report and information on where the report can be reviewed. Those to be notified include:

#### Notification List

Name	Affiliation	Address & Phone
Joseph A. Curtatone	Mayor	City Hall 93 Highland Ave. Somerville, MA 02143 (617) 625-6600 ext 2100
Brian Green, M.D.	Chair, Board of Health	Attn: Health Department Director City Hall Annex 50 Evergreen Ave. Somerville, MA 02145 (617) 625-6600 ext 4300
Denise Provost	State Representative	24 Beacon Street, Room 473B Boston, MA 02133 (617) 722-2263
Patricia D. Jehlen	State Senator	24 Beacon Street, Room 424 Boston, MA 02133 (617) 722-1578
(Not yet identified)	Key Petitioner	N/A

#### 4.4 Public Meetings

The City will brief the public about the status of the Conway Park disposal site during the remedial action process. Meetings will take place at the following milestones, if they are necessary, and draft reports will be presented:

- PIP
- Phase II SOW
- Phase II Report
- Phase II Risk Assessment SOW
- Phase III Remedial Action Plan
- Phase IV Remedy Implementation Plan
- IRA or RAM Plans
- Permanent or Temporary Solution

Meetings will serve two purposes: 1) to provide community officials and the general public with a progress report regarding remedial response actions at the site, and 2) to provide an opportunity for the public to question and comment on remedial action plans for the Site.

The City will send notices announcing public meetings to individuals on the Site mailing list. The City will prepare meeting summaries, submit the summaries to MassDEP, and place a copy of the summaries in the local information repository.

#### 4.5 Public Comment Opportunities

The City will provide specific opportunities for the public to submit comments about documents concerning the Site. When key documents are available in draft form, they will be provided to the information repositories, and a notice of their availability will be sent to 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 the City, and the length of the public comment period. Typically, the comment period is 20 calendar days. Any public comment period may be extended, if requested by the public, for a minimum of an additional 20 days. The City will be responsible for providing document copies to the information repositories and to the MassDEP Site file, as well as sending out notices of availability of any documents it prepares.

Public comment periods are required for the following:

- Draft PIP (and revisions)
- Phase II SOW
- Phase II Report
- Phase II Risk Assessment SOW
- Phase II Risk Assessment Report
- Phase III Remedial Action Plan
- Phase IV Remedy Implementation Plan
- IRA or RAM Plans and Completion Statements
- Permanent or Temporary Solutions (including AULs)

#### 4.6 Response to Comments

The City will prepare a summary of all comments received on each document available for public comment, and the City's responses to these comments. The response summary will indicate which comments have been incorporated into each subject document and explain why others have not. A copy of this response summary will be sent to all those who submitted comments and will be placed in the information repository and the MassDEP site file. The City will also send a notice of availability of the response summary to the mailing list. The summary will be made available prior to the City taking the remedial response action submitted for comment, or prior to moving to the next MCP phase.

#### 4.7 Public Comment Summary

In summary, the process for the public to review and comment on reports is as follows:

- Mailing list notified of availability of draft report 14 days in advance
- Draft report made available at public repositories and the City website
- Public meeting to present the draft report
- 20-day public comment period
- Comments addressed by the City
- Report is finalized

## 5.0 SCHEDULE FOR PUBLIC INVOLVEMENT

Exhibit II provides a schedule of the public involvement activities listed in Section 4.0. The schedule specifies the milestones during the remedial response, action when public involvement activities will be conducted.

Exhibit II is a graphic representation of the public involvement activities included in this PIP, and when, relative to the MCP, they will occur. Exhibit II does not provide specific dates for future activities.



## 6.0 RESPONSIBILITY FOR PUBLIC INVOLVEMENT PLAN

The City has voluntarily assumed responsibility for conducting response actions and public involvement activities for the Site. The City has developed this PIP and is responsible for carrying out the activities listed in this PIP during the Site cleanup process.

## 7.0 REVISIONS TO PUBLIC INVOLVEMENT PLAN

This PIP may be revised as necessary during the course of the remedial response action process. If revisions are proposed, the City will place copies of any proposed changes in the local information repository, and will send a notice of the availability of recommended changes to the mailing list. The City will hold a 20-day public comment period (see Section 4.5 above) on the proposed revised Plan. The City will review any comments received and revise the Plan as appropriate. The final revised Plan will be placed in the information repositories.

Exhibit I

Public Comments

## Public Comments

### Feedback at Meetings prior to PIP Designation

1. Several residents raised concerns about the length of time that Conway Park will be closed while the City conducts response actions.
2. The City has also received questions regarding whether and when the splash pad area (eastern portion of the Playground) will be open.

### Comments Received in the Original Petition

The following comment/request was included in the original petition, sent to the City on May 28, 2018. The petitioners' comment is presented below, numbered and in ***bold italicized*** text, followed by the City's response in plain text:

1. ***"We request an information repository with any and all the documents at the Central Library, 79 Highland Ave, Somerville, MA 02143, (617) 623-5000. We request public meetings for you to present documents and a comment period."***

As discussed in Sections 4.1 and 4.4, respectively, the City

### Comments Received during the Draft PIP Public Comment Period and the City's Response

The following comments/requests were included in a letter sent to the City on June 15, 2019, during the Draft PIP comment period, by an individual petitioner. The petitioner's comments are presented below, numbered and in ***bold italicized*** text, followed by the City's response in plain text:

1. ***"Public meetings should be held at a time convenient for people who work so they can attend. Getting through traffic generally during this time, and in particular traveling through Union Square from the west due to the heavy construction, is difficult, and people should have time for dinner, etc. before the meetings. Therefore, it is requested that future meetings not be held before 7:00 pm."***

The City will hold those future public involvement meetings required by the MCP and/or MassDEP Interim Policy WSC-800-90 at 7:00 pm or later.

2. ***"In addition, this will allow Councilman Ward 2, Jefferson T. Scott (J. T. Scott) more time to attend if he has a committee meeting or other council member's meeting that night, which he must attend, which was his reason for not attending the PIP meeting on May 29, 2019 until its end. However, I do not speak for him."***

As indicated in the response to comment number 1 above, the City will hold those future public involvement meetings required by the MCP and/or MassDEP Interim Policy WSC-800-90 at 7:00 pm or later.

- 3. “Given all of the traffic in Union Square, it would be more convenient for the neighborhood residents to attend meetings at the City Hall or the Kennedy School instead of traveling from the west through heavily congested Union Square to the Public Safety Building at 220 Washington Street, Union Square, unless the meeting is held there during a time when the heavy traffic congestion has lessened.”***

Every effort will be made to hold those future public involvement meetings required by the MCP and/or MassDEP Interim Policy WSC-800-90 at one of the venues suggested in comment number 3; however, the actual location of future meetings will depend on the availability of those venues, their accessibility, their suitability for presenting information (such as a PowerPoint presentation) in a format that can easily be viewed, and for access by local media.

- 4. “Please upload to the Department of Environmental Protection (“DEP”) website and the City of Somerville Conway Park website, all of the pictures that Licensed Site Professional George D. Naslas said he took of the material that was dug up from Conway Park, as he said he would at the PIP meeting on May 29, 2019.”***

The City’s consultant, Weston & Sampson, is finalizing a letter report that summarizes the May 2019 test pitting activities. The letter report will include a photographic log containing photos taken by Weston & Sampson staff. The City will upload the final letter report to the City’s dedicated Conway Park webpage ([www.somerville.gov/conway](http://www.somerville.gov/conway)) and the MassDEP’s online “Searchable Sites” database (<https://eeaonline.eea.state.ma.us/portal#!/wastesite/3-0034868>).

- 5. “Please upload to the DEP website and City of Somerville Conway Park website, the screens/slides that were presented at the PIP meeting on May 29, 2019 and all future meeting screens/slides, which are distinguishable from video of the meeting(s).”***

The City uploaded the presentation slides from the May 29, 2019, Draft PIP presentation meeting to the City’s dedicated Conway Park webpage ([www.somerville.gov/conway](http://www.somerville.gov/conway)) and will also upload the slides to MassDEP’s online “Searchable Sites” database (<https://eeaonline.eea.state.ma.us/portal#!/wastesite/3-0034868>).

- 6. “In the future, if you send anything to the mailing list during the PIP process by certified mail, please also send an additional copy via regular mail for anybody that does not want to go to the post office, as you, via agreed to do at the PIP meeting on May 29, 2019.”***

The City will send that future public involvement correspondence required by the MCP and/or MassDEP Interim Policy WSC-800-90, by both certified and regular mail through the US Postal Service.

## Exhibit II

### Public Involvement Plan Schedule

Exhibit II  
Conway Park Public Involvement Schedule

Submit/Start Date	End Date	Milestone/Task
3/28/2019		Tier Classification (Officially a PIP Site)
4/17/2019		Response to Petitioners Sent
5/16/2019		Public, Petitioners Notified of Draft PIP
5/29/2019		Draft PIP Presentation
5/29/2019	6/19/2019	Draft PIP Public Review Period
7/20/2019		Submission/Public Notified of Final PIP
TBD		Public, Petitioners Notified of Draft RAM Plan
TBD	TBD	RAM Plan Public Review Period
TBD		Submission/Public Notified of Final RAM Plan
TBD	TBD	Implementation of RAM Plan
TBD		Public, Petitioners Notified of Draft RAM-C/PS/AUL
TBD	TBD	RAM-C/PS/AUL Review Period
TBD		Submission/Public Notified of Final RAM-C/PS/AUL

# DRAFT PUBLIC INVOLVEMENT PLAN

Exhibit III

Mailing List



## Conway Park Mailing List

Hon. Joseph Curtatone  
Mayor, City of Somerville  
City Hall  
93 Highland Ave.  
Somerville, MA 02143

Doug Kress  
Director of HHS, City of Somerville  
City Hall Annex  
50 Evergreen Ave.  
Somerville, MA 02145

Alyssa Napoleon  
23 Park St., #4  
Somerville, MA 02143

Christine Guth  
15 Ivaloo St.  
Somerville, MA 02143

Alex Radunsky  
9 Harrison St.  
Somerville, MA 02143

Claudia Murrow  
23 Park St., #2  
Somerville, MA 02143

Arthur Lambert  
18a Central St.  
Somerville, MA 02145

Catherine Smart  
18a Central St.  
Somerville, MA 02145

Derek Neilson  
23 Park St., #4  
Somerville, MA 02143

Lobsang Choedar  
13 Harrison St.  
Somerville, MA 02143

Maurice Smith  
18 Harrison St.  
Somerville, MA 02143

Marlene Wicherski  
15 Harrison St.  
Somerville, MA 02143

Liljian Wang  
23 Park St., #1  
Somerville, MA 02143

Mark Renouf  
23 Park St., #3  
Somerville, MA 02143

Adam Cavanaugh & Emmanuelle Levantia  
23 Park St., #5  
Somerville, MA 02143

James & Marta Batmasian  
27 Park St  
Somerville, MA 02143

James & Marta Batmasian  
27 Park St  
Somerville, MA 02143

Kumar Dangi  
7 Allen Ct  
Somerville, MA 02143

Ellen Christenson  
9 Allen Ct  
Somerville, MA 02143

Kevin Emery  
10 Allen Ct  
Somerville, MA 02143

Keith Glover  
565 Somerville Ave  
Somerville, MA 02143

Kai Kai Wang  
557 Somerville Ave  
Somerville, MA 02143

Moliage Jules  
3 Harrison St.  
Somerville, MA 02143

Alex Steinbergh  
17 Ivaloo St.  
Somerville, MA 02143

Christopher & Christine O'Brien  
17 Ivaloo St.  
Somerville, MA 02143

James Symonds  
17 Ivaloo St.  
Somerville, MA 02143

Daniel Lev  
17 Ivaloo St.  
Somerville, MA 02143

Birte & Christine O'Brien  
21 Ivaloo St.  
Somerville, MA 02143

Senator Patricia Jehlen  
24 Beacon St. Room 424  
Boston, MA 02133

Representative Denise Provost  
24 Beacon St. Room 473B  
Boston, MA 02133

Manuel Pina  
559 Somerville Ave  
Somerville, MA 02143

Charlene Caton  
553 Somerville Ave  
Somerville, MA 02143

Resident  
7 Harrison St.  
Somerville, MA 02143

Shahanaj Pervin & Shahidullah Syed  
17 Ivaloo St.  
Somerville, MA 02143

David Light & Leslie DeLight  
17 Ivaloo St.  
Somerville, MA 02143

Donald Salama  
17 Ivaloo St.  
Somerville, MA 02143

Stephen & Robert Clark  
19 Ivaloo St.  
Somerville, MA 02143

MassDEP Site File  
MassDEP Northeast Regional Office  
Bureau of Waste Site Cleanup  
205B Lowell Street  
Wilmington, MA 01887

The Somerville Times  
699 Broadway  
Somerville, MA 02144

City Councilor JT Scott  
269 Washington St.  
Somerville, MA 02143