

DECOULOS & COMPANY

ENVIRONMENTAL ENGINEERING & LAND PLANNING

VIA FEDEX

Wednesday, May 26, 2004

Jonathan E. Hobill, Regional Engineer
DEP Bureau of Waste Site Cleanup
20 Riverside Drive
Lakeville, MA 02347

RE: IRA Plan Modification; Eagle Gas Station, 131 Main Street, Carver; RTN 4-17825

Dear Mr. Hobill:

On behalf of Eagle Gas, Inc., Decoulos & Company is pleased to submit additional information related to the IRA Plan Modification dated April 21, 2004 (the IRA Mod Plan) for the above referenced release.

Since the submission of the IRA Mod Plan, an extensive title examination of the property at the stormwater drainage system outfall area to South Meadow Brook has been undertaken. Property ownership in the outfall area is reflected on the 24"x 36" site plan entitled "Existing Conditions, Eagle Gas Station, Carver, Massachusetts; dated May, 2004; prepared by Decoulos & Company". The plan was recently provided in Appendix B of the Phase I Site Investigation Report for the release.

As described in the Phase I report, the Town of Carver maintains a right to inspect and repair utilities within the outfall area. The stormwater drainage system lies within the 1903 layout of Main Street established by the Plymouth County Commissioners. The discontinuance of the 1903 layout was set forth in Decree No. 1124 from the Commissioners and is described fully at the Plymouth Registry of Deeds in Book 3040, Page 255. On Page 267 of the Decree it is stated:

All of that part of the old highway lying outside the above-described lines shall be discontinued as a public highway, unless otherwise noted on the plan mentioned below, when the new roadway has been constructed within the limits of the above-described lines to the satisfaction of the County Commissioners.

The Town of Carver shall have the right to enlarge and maintain drains, water mains, hydrants or any other utilities or grant permits to any public utility company to maintain their utilities in any part of Route 58 which has been discontinued as a public way in the above decree.

A reduced copy of the plan showing Section 3 of the discontinuance of old Main Street was provided in Appendix J of the Phase I report.

Last evening, the Carver Board of Selectmen authorized Eagle to perform response actions related to the assessment and remediation of the storm water drainage system piping and outfall discharge area.

Based upon a preliminary review of the IRA Plan Modification by Cynthia Baran of your office, we propose the following additional actions:

1. Eagle shall obtain approval or emergency certification from the Carver Conservation Commission under the MA Wetlands Protection Act, G.L. c. 131, § 40 and the local Carver Wetlands By-Law to place sand bags, absorbent materials and store drums within the stormwater outfall area. The permit request shall include a sketch plan detailing sand bag placement configuration/location and a construction protocol for sand bag installation to minimize impact to the resource area.

Inspection sheets shall be developed to record conditions observed during the stormwater outfall discharge area inspection. All actions taken at the outfall area shall be documented and recorded on the sheets. The inspection sheets shall be filed with all subsequent IRA Status Reports.

2. A plan indicating proposed surface water and sediment sampling locations is attached hereto. The sampling locations shall be permanently marked along the banks of South Meadow Brook.
3. A revised schedule (based upon starting subsequent to the IRA Modification approval date) to perform the proposed IRA activities is attached hereto.
4. The frequency of inspection of the storm water outfall discharge area shall be increased to once a week. If a significant rainfall event occurs - defined as greater than 1/2" of rainfall - an inspection shall occur within 24 hours after the event.
5. Sediment samples shall be collected from the impacted catch basin and drainage manhole in front of 133 Main Street and, if warranted, analysis for RCRA 8 metals and EPH shall be performed prior to conducting the proposed video survey of the storm water distribution system.
6. A site plan shall be prepared for the IRA Status or Completion Report that accurately depicts the location of all monitoring wells and private water supply wells, as well as indoor air, surface water and sediment sample locations. The plan shall indicate current contaminant concentrations at each location. Groundwater contours and the areal extent of the contaminant plume shall also be depicted. One cross section shall be prepared that depicts monitoring wells, private water supply wells, the storm drainage system, diesel fuel supply line, former and existing underground storage tanks, soil stratigraphy and contaminant profile.

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7. All work conducted as part of this IRA Plan Modification shall be conducted in accordance with the Response Action Performance Standard (RAPS), as defined by 310 CMR 40.0191. At a minimum, this shall include following the guidelines set forth in the Department's Publication WCS-310-91, Standard References for Monitoring Wells. All sample collection, custody and documentation of the analytical data and related QA/QC protocols shall be in accordance with 310 CMR 40.0017.
8. Pursuant to 310 CMR 40.0017, analytical data used in support of recommendations, conclusions or LSP Opinions pertaining to assessment, removal, or containment actions shall be scientifically valid and defensible and of a level of precision and accuracy commensurate with its stated or intended use. Specifically, the detection limits established shall be less than, or equal to, the applicable standards.
9. Pursuant to 310 CMR 40.0030, all remediation waste generated shall be properly handled and disposed of within 120 days of the date of generation.
10. The Department shall be notified seventy-two (72) hours in advance of the fieldwork associated with this IRA to provide the Department the opportunity to inspect the work as it is conducted.

Please feel free to call or email if you have any questions or concerns. Thank you.

Very truly yours,

James J. Decoulos, PE, LSP
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cc: Francis J. Casey, Carver Board of Selectmen
Robert C. Tinkham, Jr., Carver Board of Health
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Immediate Response Action Schedule - DEP RTN 4-17825

