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MEMORANDUM

TO: Mill Creek Residential
Attn: Mr. Anand Boscha

FROM: GZA GeoEnvironmental, Inc.
David E. Leone, LSP

DATE: February 20, 2020

FILE NO: 01.0174087.10

RE: Proposed Soil Management and Remediation Plan Framework
751-761 Boston Post Road
Weston, Massachusetts

GZA is pleased to present this framework for the soil management and remediation plan to be implemented for the proposed redevelopment of the above-referenced property (the "Site").

Investigations by GZA and others have indicated the presence of elevated lead and arsenic concentrations in soil in an area formerly utilized as an orchard, and elevated lead concentrations in soil adjacent to a barn. The lead and arsenic concentrations in the orchard area have been attributed to the former use of lead arsenate pesticides; the lead concentrations in the barn area have been attributed to the presence of lead-based paint (LBP) from the barn siding. Sections 310 CMR 40.0317(8)(c) and 310 CMR 40.0317(8)(a), respectively, of the Massachusetts Contingency Plan (MCP) exempt such conditions from notification to MassDEP.

GZA's findings were presented to the Weston Zoning Board of Appeals (ZBA) in support of the proposed site redevelopment. The Weston ZBA engaged Mr. James Luker of Arcadis U.S., Inc. (Arcadis), a Licensed Site Professional (LSP), to conduct an independent review of these findings. During conversations prior to and during ZBA meetings on December 9, 2019, and January 27, 2020, GZA outlined a prospective soil management and remediation plan. As requested by the ZBA, this document was prepared to present the proposed framework of this plan for review and approval by the ZBA and Mr. Luker. A more detailed soil management and remediation plan for handling the arsenic- and lead-impacted soils identified on the property will be provided at a later date (anticipated to be at least three weeks prior to the initiation of construction).

Soil Management and Remediation Plan Framework

The soil management and remediation plan outline a schedule for proposed site activities related to the handling and management of arsenic- and lead-impacted soils, and will include provisions for the following:



- Excavation and handling of impacted soils. Figures will be included in the plan noting the location and extent of arsenic- and lead-impacted soils (i.e., equal to or greater than MCP Reportable Concentrations for Soil Categorized as RCS-2) based on soil sampling and analysis.
- Dust monitoring requirements, including frequency, duration, and action levels (based on maximum soil concentrations encountered). Dust monitoring will be required during the handling of impacted soils.
- Dust mitigation measures to be conducted if and when dust monitoring action levels are exceeded.
- Wheel wash or other controls to mitigate potential offsite tracking of impacted soils by vehicles.
- Stockpiling requirements, including requirements for covering impacted materials when not being actively handled, segregation of impacted materials from clean materials, and stockpile volume restrictions.
- Tracking of impacted material during construction, including stockpile locations and off-site disposal locations, as needed.
- Confirmatory sampling of impacted areas, if the vertical and horizontal extent has not been previously assessed.
- Characterization testing for impacted soils requiring off-site disposal (parameters to be based on facility requirement; toxicity characteristic leaching procedure (TCLP) analysis anticipated for off-site disposal of soils exhibiting total metals concentrations 20 times greater than prospective TCLP limits).
- Guidelines for the reuse of impacted soils during redevelopment, including recommended clean cover thicknesses to mitigate the potential for exposure of future residents to impacted material. Procedures will also be developed to track and document the location of soil reuse onsite, and guidelines will be developed for the notification of future residents of the potential for exposure to these soils.
- Should soils with greater than 20 milligrams per kilogram of arsenic or greater than 200 milligrams per kilogram of lead be left in place after excavation, assessment of potential risks to future residents will be conducted.

In addition, building hazardous materials surveys will be conducted prior to the renovation, demolition, or relocation of structures on the property. Should LBP be detected on exterior surfaces of a given structure, shallow soils from the perimeter of that structure will be sampled and analyzed for total lead. Handling of lead-impacted soils encountered during this testing will be conducted in accordance with the soil management and remediation plan.

We trust that this framework will be suitable until the formal soil management and remediation plan is developed.