

Ms. Loni Fournier
Senior Planner, Conservation Commission
Town of Hingham
210 Central Street
Hingham, MA 02043

March 5, 2021
File No. 4097.00

Re: Updated Soil Management Plan (SMP)
Former Merriman Site
100 Industrial Park Road
Hingham, MA

Dear Ms. Fournier,

Attached please find the updated Soil Management Plan (SMP) prepared on behalf of JEB Group, LLC (the property owner) in support of the proposed redevelopment of the above-referenced Site into a proposed package delivery facility.

This SMP has been updated since the previous SMP, dated July 22, 2020, with the addition of the Site-specific Massachusetts Contingency Plan (MCP) Release Abatement Measure (RAM) soil handling procedures to be implemented during earthwork activities. The following additional sections have been added to Section 3.0 Procedures:

- 3.1 RAM Soil Screening Action Levels (SALs)
- 3.2 Excavated Soil Screening Procedure
- 3.3 Extent of Excavation Soil Screening Procedure

With this updated SMP we understand that the Hingham Conservation Commission has all the necessary information to approve the current Notice of Intent (NOI) prepared by the BL Companies and issue the final Order of Conditions.

Should you have any questions, please do not hesitate to call.

Very truly yours,
SANBORN, HEAD & ASSOCIATES, INC.



Matthew P. Heil, PE, LSP
Vice President

Encl: Updated Soil Management Plan, March 5, 2021

cc: Tim Casey and Tom Nolan, JEB Group, LLC
Kevin Hixson, BL Companies

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UPDATED SOIL MANAGEMENT PLAN
100 Industrial Drive
Hingham, Massachusetts
RTN 3-00331

1.0 INTRODUCTION

On behalf of JEB Group, LLC (the property owner), Sanborn, Head & Associates, Inc. (SHA) has prepared this Updated Soil Management Plan (SMP) outlining soil management procedures to be followed during the renovation of the existing approximately 149,000 square foot (sf) building and surrounding area into a proposed package delivery station at 100 Industrial Drive, Hingham, Massachusetts (Site). The proposed redevelopment is detailed in the plans titled *Land Development Plans Issued for Town of Hingham Conservation Commission and Planning Board Approval, 100 Industrial Park Road, Hingham, MA*, prepared by BL Companies of Meriden, Connecticut, dated March 6, 2020 and revised on March 5, 2021. This SMP has been updated since the previous SMP, dated July 22, 2020, to include the Site-specific Massachusetts Contingency Plan (MCP) Release Abatement Measure (RAM) soil handling procedures to be implemented during earthwork activities.

An Activity and Use Limitation (AUL) was recorded at the Plymouth District of the Land Court on April 9, 2012. Section 3, (iii) of the AUL requires that:

Except for emergency utility repair, a Soil Management Plan must be approved by an LSP prior to the commencement of any activity that is likely to disturb Site-related soil. The Soil Management Plan should describe appropriate soil management characterization, storage, transport and disposal procedures in accordance with the provisions of the MCP cited at 310 CMR 40.0030 et seq. Workers who may come into contact with the soil, groundwater, or other environmental media at the Site should be appropriately trained on the requirements of the Plan, and the Plan must remain available on Site throughout the course of the project. Following utility emergency work, soil must be returned to the excavation and the area will be recovered by pavement or landscaping;

The Site is located in an industrial park, immediately south of Route 3, in the southeastern portion of Hingham, Massachusetts. The Site was formerly occupied by PCC Specialty products, which manufactured brass, bronze, and stainless-steel products. The contaminants of concern at the Site varied with location depending on the historic activity within the specific portion of the property. The potential concerns included metals, polycyclic aromatic hydrocarbons (PAHs), petroleum constituents, and chlorinated solvents.

The risk assessment concluded that commercial or industrial workers who did not come into direct contact with sub-surface soils were not at significant risk. A trespasser or visitor to the property was also found to not be at risk. But land use activities such as single family residential, school or daycare earthen playground, play fields and other activities that would involve extensive use by children, who potentially could come into contact with the soil on a frequent basis, were to be prohibited.

Although the soils that remain on-Site do not represent a significant risk to a commercial worker or trespasser at the property, they do represent a potential risk to a construction worker who is exposed directly to the soil or dust. That potential risk can be mitigated if appropriate soil management and health and safety measures are implemented.

2.0 OBJECTIVE

The objective or intent will be to re-use excavated soils on Site, to the maximum extent feasible. We understand from the Site cut/fill calculations completed by others that the proposed redevelopment scheme is approximately balanced. Specifically, we understand that the anticipated volume of bedrock to be removed from the Site is consistent with the anticipated volume of soil to be generated such that a significant net soil removal from the Site is not anticipated to complete the proposed project earthwork.

Soil excavated from within former source areas will be field screened by a representative of the JEB Group, LLC's Licensed Site Professional (LSP) at the frequencies noted below. Any portion of the excavated soil that exceeds the RAM Soil Screening Action Levels (SALs) noted below will be separated from the other soil, stockpiled on and covered by secured polyethylene sheeting, and sampled for laboratory analyses by the JEB Group, LLC's Licensed Site Professional (LSP). Based on the data and the subsequent opinion of the LSP, that soil may or may not be re-used on-site. If on-Site re-use is inappropriate, the soil will be sampled for off-Site reuse/disposal pre-characterization laboratory analyses and exported from the property for off-Site re-use or disposal.

The Site has been extensively characterized under the MCP and the extent of the residual impacts (i.e., the former source areas) is well understood. Nonetheless and as a conservative measure, soils excavated from areas outside of the former source areas will also be field screened for both visual and olfactory evidence of potential soil impacts. Soils identified outside of the former source areas that display either visual or olfactory evidence of potential impacts will also be screened and managed in accordance with the procedures outlined in Sections 3.2 through 3.5 below.

3.0 PROCEDURES

3.1 RAM Soil Screening Action Levels (SALs)

The Release Abatement Measure (RAM) Soil Screening Action Levels (SALs) are as follows:

- X-ray Fluorescence Meter (XRF)
 - Lead = 710 mg/kg
 - Copper = 2,200 mg/kg
 - Nickel = 72 mg/kg
- Photoionization Detector (PID) Soil Jar Headspace
 - 100 parts per million by volume (ppmv)
- Visual and/or Olfactory Evidence of Potential Impacts

3.2 Excavated Soil Screening Procedure

Soil excavated during earthwork activities (i.e., for utilities, grading, etc.) will be field screened for potential SAL exceedances at an approximate frequency of at least 1 sample per 100 cubic yards (cy) of excavated soil.

- \leq SALs – Soil with screening results below or equal to the SALs will be temporarily stockpiled (as needed) and reused on-Site as backfill within the historical source area provided such soil is geotechnically suitable for reuse.
- $>$ SALs – Soil with screening results above the SALs will be managed as follows:
 - Stockpiled on and covered with secured polyethylene sheeting in a dedicated on-Site location.
 - Sampled by the LSP for laboratory analyses of the corresponding risk driver (lead, copper, C₁₁-C₂₂ aromatic hydrocarbons, and/or nickel) at an approximate frequency of at least 1 sample per 100 cy of stockpile volume.
 - If laboratory results \leq SALs, then soil may be reused on-Site as backfill within the historical source area provided such soil is geotechnically suitable for reuse.
 - If laboratory results $>$ SALs, then soil will be sampled by the LSP for off-Site reuse/disposal pre-characterization parameters and exported for off-Site reuse/disposal under the direction of the LSP.

3.3 Extent of Excavation Soil Screening Procedure

Soil remaining at the extent of excavations where soils $>$ SALs were identified will be field screened for potential SAL exceedances at an approximate frequency of at least 1 sample per 50 linear feet of utility trench and 1 sample per 2,000 square feet (sf) of open cut.

- $>$ SALs – Excavations with soil remaining at the extent of excavation with screening results above the SALs will be backfilled with \leq SAL soil or clean imported soil as soon as practical. Backfilled soil will be graded and compacted with a smooth drum roller to reduce the potential for stormwater infiltration until earthwork is completed.

3.4 Temporary Stockpile Criteria

It is anticipated that certain soils will be excavated during the redevelopment earthwork, temporarily stockpiled and then placed/re-used at some other appropriate location within the property boundaries, as noted above. The stockpiling of the excavated soils will be performed in conformance with state and local regulations governing contaminated material and soil waste. Minimum stockpile handling criteria are as follows:

1. Stockpile maintenance will be the responsibility of the Contractor.
2. Excavation, material handling and stockpiling will be performed in a manner that limits the mixing of different materials containing varying levels and/or types of contamination

as noted above. Care will be taken to segregate and separately stockpile any solid wastes such as concrete debris, and any soil exhibiting visual and/or olfactory evidence of significant contamination.

3. The transfer of all materials from the excavation area to designated temporary stockpile areas will be the responsibility of the Contractor and will be conducted in such a manner as to limit the spread of the soils or potentially contaminated materials.
4. Soils that will remain in a stockpile for more than 24 hours will be graded by the Contractor to shed water. The stockpiled soils that require covering as noted above will be covered by the Contractor prior to inclement weather and at the end of each work day with minimum 6-mil-thick polyethylene sheeting overlapped and weighted to form a continuous waterproof barrier over the material. The cover will be maintained throughout the stockpile period to control water entering the stockpiled materials and to limit dust generation until such time as the LSP provides an opinion regarding potential re-use or disposal.
5. Stockpile areas will be graded such that stormwater runoff is diverted from stockpiled materials. Stockpile slopes will be no steeper than 1 horizontal to 1 vertical.

3.5 On-Site Re-use of Excavated Soils

The AUL allows for the on-Site re-use of soils at the property provided that a condition of No Significant Risk, as determined by the LSP, continues to be maintained upon completion of earthwork activities. Such soil may not be reused within the 100-foot buffer zone of the nearby wetlands.

3.6 Dust Control

The primary potential mechanism for the off-Site transport of the Site soils will be windblown dust. In order to prevent this from occurring, the Contractor will have available on-Site a source of water to apply as a spray mist if the weather conditions result in the generation and potential migration of dust or if the RAM dust action level is exceeded.

3.4 Worker Health and Safety

The Contractor is responsible for the health and safety of their employees. However, the risk characterization completed in support of the Response Action Outcome (RAO) closure report concluded that a detailed Health and Safety Plan was not required for workers who are exposed to Site soils, outside of the former manufacturing building footprint, for a period less than six months, as long as the criteria set forth at 310 CMR 40.0018 are met.

4.0 DISPOSITION OF REMEDIATION WASTES

As detailed in Section 3.2, if soils are identified during the excavation that distinctly differ from the surrounding soil in terms of SAL exceedances, visual staining or olfactory evidence of potential contamination, those soils will be separated and tested by the LSP and then based on that data and the subsequent opinion of the LSP may require off-Site reuse or disposal. The off-Site disposition

of such soils will depend on the results of stockpile characterization and an assessment of relevant management options in compliance with applicable laws and regulations.

5.0 DISPOSITION OF REMEDIAL WASTEWATER

Should the construction-related excavations encounter groundwater which requires removal, any such groundwater will be pumped and then discharged to the subsurface on-Site in accordance with 310 CMR 40.0045: remedial wastewater discharges to the ground surface or subsurface and/or groundwater, managed in accordance with a USEPA National Pollution Discharge Elimination System (NPDES) Remediation General Permit (RGP) obtained by the Contractor should surface water discharge be required, or disposed at the expense of the Contractor at a permitted off-Site wastewater disposal facility pre-approved by the LSP.

Prepared by:



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Matthew P. Heil