Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

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August 9, 2016

City of Greenfield
Department of Planning and Development
114 Court Street
Greenfield, MA 01301

Attention: Mr. Eric Twarog
Director of Planning and Development

Re: Greenfield
Former Lunt Silversmith
298 Federal Street, Greenfield
Release Tracking # 1-18869
Approval of Immediate Response Action

Dear Mr. Twarog:

On August 1, at 3:25 P.M., Bruce Nickelsen of O'Reilly, Talbot & Okun (OTO) notified the Department of Environmental Protection (the Department) of the presence of a potential imminent hazard at the subject location (the site). As reported, OTO personnel evaluated recent indoor air sampling results from locations inside the building. Based on these evaluations, the volatile organic compound (VOC), trichloroethylene or "TCE", is present in indoor air at concentrations which may pose an imminent hazard. As also reported the presence of TCE in indoor air may be attributable to TCE in on-site contaminated soil and groundwater volatilizing and migrating to the inside of the building.

The Department was notified of the presence of chlorinated VOCs and heavy metals in both soil and groundwater at the site on September 18, 2012 during an ASTM Phase II Site Investigation Report prepared for the Town of Greenfield. In addition, these conditions were also found during a "Removal Program Preliminary Assessment/Site Investigation" Report performed by the US EPA in July 2014. By Notice of Responsibility letter dated September 27, 2012, the Department notified Lunt Silversmiths, Inc. of its liability for response actions at the site. At the time of notification, the Department assigned the release the release tracking number (RTN) 1-18869 to this release.

On March 6, 2015, a Letter of Responsibility for Municipality with Exempt Status (LOR) was issued to the City of Greenfield after the City became owner of the site due to non-payment of taxes. The LOR stated that the City will not be considered a Potentially Responsible Party (PRP) with liability for response action cost and damages under the M.G.L. c 21E. However, the **Massachusetts Contingency Plan ("MCP") requires responsible parties and any other person undertaking response actions to perform Immediate Response Actions in response to sudden releases, Imminent Hazards and Conditions of Substantial Release Migration**. Such persons must continue to evaluate the need for Immediate Response Actions and notify the Department immediately if such a need exists. A potential imminent hazard associated with indoor air contaminants of concern constitutes a new condition requiring

notification to the Department within 2-hours (a 2-hour condition) and completion of an Immediate Response Action (IRA) in accordance with 310 CMR 40.0412 of the MCP.

As discussed with OTO personnel, the Department approved the following response actions as Immediate Response Actions (IRA):

- Performing additional indoor air sampling in the patient rehabilitation rooms area located on the main level of the medical treatment center;
- Venting of basement and resample indoor air one week after venting;
- Sealing cracks/utility annular spaces in basement level and subsurface walls;
- Enclosing and passively venting sumps; and
- Adjusting the HVAC system (if deemed feasible) to provide outside make-up air for heating and cooling system combustion/drafting and over-pressurization of building's interior.

In addition, the Department requires assessment for the source and potential vapor intrusion pathways of TCE.

MassDEP is aware that the developer, 401 Liberty Street, LLC in Springfield, is acting as an "other person" under the MCP, has hired and LSP and is performing the IRA response actions required in this letter.

Pursuant to 310 CMR 40.0420 and 40.0425, an IRA Plan or IRA Completion Statement shall be submitted to the Department within 60 days of the date the Department receives notification of a 2-hour condition (for this reporting, by no later than **September 30, 2016**); an IRA Status Report is due within 120 days after notification and every six months thereafter until completion of the IRA.

If you have any questions regarding this matter, you should contact Caprice Shaw at (413) 755-2222 or Cynthia Pawloski at (413) 755-2247 or at the above letterhead address.

Sincerely,

Eva V. Tor
Deputy Regional Director
Bureau of Waste Site Cleanup

EVT:CP:CGS
P:18869 2hr tce

ecc: Greenfield
Fire Department
Board of Health
Mayor's Office
Bruce Nickelsen, OTO, LSP of Record

cc: Attorney Raipher Pellegrino, 401 Liberty Street, LLC., 265 State Street, Springfield, MA 01103-1950
Peggy Sloan, Franklin Regional Council of Governments, John W. Oliver Transit Center, 12 Olive Street, Suite 2, Greenfield, MA