

ATTACHMENT 1

Olin believes that the investigation completed as part of the Supplemental Investigation Addendum adequately identified the limits of contamination, based on a sound scientific approach to the investigation. Presence of former wetland areas or historically placed waste materials are not indicated by historical evidence, reports from residents, inspections, and investigation results from adjacent properties. Additional investigation beyond what has currently been completed is not necessary. While additional investigation may serve to slightly reduce some of the uncertainty with regard to the extent of fill materials, uncertainty will still remain about the exact location of all fill. It is likely that during remediation, in a few locations fill may be found to extend beyond the current identified limits, and remediation may be required on a few additional properties. The lines delineating extent of fill drawn are based on point values and interpolation of fill locations between points so that fill in some locations may extend beyond these lines, while in others not extend as far as these lines. Even if extensive additional investigation was completed, it would not guarantee that all fill boundaries were exactly defined, and that no remediation beyond the projected fill boundaries would be needed. However, in the spirit of cooperation, Olin is proposing additional soil borings at select locations to visually evaluate the possibility of fill extending from one property where fill was found to an adjacent property, as described below. No additional chemical analysis is proposed as part of this effort; decisions about the presence of fill will be made on these visual observations. For properties where sufficient data are available to conclude that no fill is present, the rationale is also provided below. For properties where Olin does propose additional investigation, proposed boring locations are shown on Sheet 1.

237 Butler and 105 Marlboro

Comment (237 Butler): Provide rationale for south bend in edge of fill across Marlboro Street or install boring in NW corner to substantiate edge of fill.

Comment (105 Marlboro): Need to substantiate no fill is present on site. Need to verify the extent of fill to the South. Fill and related contaminated soil may extend from south on to the property. The fill to the south of the property was not delineated. (Drawn arbitrarily).

Response: The boundary of contiguous fill was delineated to the extreme southwest corner of this property by three borings (M1001, M1031, and M1032) about 10 to 20 feet apart on 237 and 231 Butler. The edge of fill boundary was extended northward from these borings along the west edge of 237 Butler based on a number of factors:

Borings across Butler Street to the west (L1023 and L1024) penetrated 1.1 and 1.7 feet of fill and a boring across Marlboro Street to the northwest in front of 109 Marlboro penetrated 1 foot of fill. Consequently, if the edge of fill was projected to the north-northwest based on its position and orientation on 229 and 231 Butler, it would intersect these borings and so must be farther east of such a projected trend.

The edge of fill along the north side of Marlboro Street is oriented almost east-west, parallel to the street. At some point east of boring K1022 the trend of the line must shift southward and by convention this location was placed halfway between K1022 and the next boring to the east with K1089 (no fill). The line's location is also nearly coincident with a point halfway between borings L1024 (fill 1.7 feet) and K1011 (no fill) and K1089.

In general, the edge of fill line's location (in plan view) is potentially very sensitive to changes in topography where the angle of intersection (in cross-sectional view) between the base of fill and the topography is very low (as evidenced by the very thin fill thicknesses found near the intersection of Butler and Marlboro Streets). It is clear from the preponderance of data along Butler Street that this street intersects the eastern edge of this fill area. Construction of the road, curbing, and sidewalk and placement of utility lines along it has almost certainly modified the original fill thickness contours. Because roadways are engineered structures incorporating both vertical and horizontal right angles, there is an inherent "squaring off" of topographic lines along roadways. There is also an underlying assumption that fill thickness contours also might

be extended further from the center of the fill area and be squared off by a combination of these factors. This effect may be magnified at a road intersection such as this where the road width, as radially measured from the fill center, is much wider than elsewhere.

By conservatively combining these factors in places where field data are absent, the placement of the line was not arbitrary, but was drawn a maximum distance from the constraining field data. Subsequent to the drawing of this line, Olin has obtained an 1877 Coastal Survey map that shows the original topography of the Southwest Satellite Area kettles. Overall the shape of these kettles on the 1877 map reflects very well their shapes on Supplemental Report Addendum sheets, which were drawn without reference to this historic map. In particular, the northeast corner of the kettle underlying block M has the same square outline on both maps.

None of the factors used to draw the line indicates (or is based upon) the presence of fill on 237 Butler and 105 Marlboro. However, because there is a gap of about 180 feet between transects (as measured along the line as drawn), which is 60 feet greater than the nominal 120-foot spacing in the approved SI Work Plan, Olin proposes transects at the northwest and southeast property lines at 237 Butler Street and 105 Marlboro, respectively.

123 Goodrich

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Comment: Need to assess debris (slag and glass) identified in NE corner R1006 and adjacent to isolated fill area.

Response: Boring R1005 was drilled in the northeast corner of 123 Goodrich, in the area of observed debris. No fill was found; the debris was surficial. Olin proposes drilling a boring in the southeastern corner of 959-957 Winchester Avenue to better delineate the southwestern edge of isolated fill area R01.

229-231 Goodrich

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Comment: Potential to fill to 2 feet, need soil boring(s) in rear of parcel to assess extent of fill identified in M1047.

Response: One boring (M1047) drilled in a small surface depression in the back yard found mixed organic rich soil and concrete fragments. XRF on this sample was 17ppm lead. Most of the backyard of this property was covered with concrete. Olin proposes borings near this depression to confirm if fill is present in this area. There are no other indications of fill from inspections and nearby borings.

237 Goodrich

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Comment: Need additional data in the northern portion of the property (in garage area) to substantiate no fill is present.

Response: The edges of contiguous fill to the northwest and of the isolated fill to the west are well delineated and do not extend onto this parcel. Other borings on properties to the northeast and east found no fill. Inspection of this parcel did not observe surficial evidence of potential filling. Substance concentrations detected at bare spot sample M3003S3, next to the driveway just north of this parcel, are consistent with the incidental, normal operation of motor vehicles at this location. Therefore, additional investigation of this property is not warranted.

293 and 297 Goodrich

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Comment (293 Goodrich): To substantiate no fill is present-need additional data at northern portion of the property to fill data gap at 17 Edward Street as edge of fill line is not delineated. (Line drawn arbitrarily).

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Comment (297 Goodrich): Need to delineate J1049 to substantiate no fill is present.

Response: The southern edge of the contiguous fill line in this block is not arbitrarily drawn but is constrained by three pairs of borings spaced across and along the fill line as specified by the approved SI Work Plan. The location and orientation of this line north of 293 Goodrich is constrained by boring pairs J1023/4 and J1035/7. A west-southwest extrapolation of this portion of the line along its curving trend brings it to the edge of fill location constrained by boring pair J1015/6 (and is consistent with the south end of this former kettle shown on the 1877 Coastal Survey map). The extrapolated line was slightly modified outward from the center of the fill area based on the generally thicker fill (1.4 to 2.4 feet) and slightly higher topography in southwestern 17 Edwards than at southwestern 462 Shelton (0.9 feet), which probably reflects grading changes brought on by land development. Two borings, J1048/9, were drilled at the far northern end of 293 and 297 Goodrich and did not penetrate any fill, consistent with the edge of fill line location. Therefore, additional investigation of these properties is not warranted.

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303 Goodrich

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Comment: Need boring on northern portion of parcel to substantiate edge of fill line.

Response: The southern edge of fill line parallel to the boundary between 303 Goodrich and 16 Edwards is well constrained at its western and eastern ends by boring pairs H1037/68 and H1040/64, respectively, which were placed along the fill line in accordance with the SI Work Plan. It is also more generally constrained by more southerly borings H1070, H1078, H1010, H1063, and H1041. Data from borings all over the southern portion of this block show that the edge of fill, which is rounded on the 1877 Coastal Survey map, has been heavily modified by development subsequent to the original filling, with many right angles following parcel boundaries and/or slight changes in topography. The line segment between 303 Goodrich and 16 Edwards, while not resulting from a natural extrapolation of its trend at each end, was placed to reflect these development modifications, in particular the edge of fill line's well constrained orientation along the southern boundary of 21 St. Mary, as constrained by the data mentioned above. Therefore, additional investigation of this property is not warranted.

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16 Marlboro

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Comment: Need additional borings to substantiate edge of fill drawn along western property line.

Response: Boring pair Q1023/4 constrain the location of the edge of fill line at the north end of the western property line of this parcel, as does boring Q1044 farther south. Four other borings (Q1015, Q1016, Q1017, and Q1050) also found no fill on this parcel. Overall, the location and orientation of the edge of fill line, as constrained by borings from Marlboro Street south and west to southern portion of 30 Marlboro, also follows the break in the northward trend of topographic contour lines in the southern parts of 30 to 16 Marlboro. This relationship is expected because the addition of fill to the original depression of the Newhall Street fill area created a level surface parallel to the south side of Marlboro Street at elevation 58 to 60 feet. The east-west trending topographic contour lines (and retaining wall) along the sloping southern side of this filled surface (located south of the homes at 34 to 26 Marlboro) must curve and connect to the natural, north-trending topographic contour lines defining the unfilled eastern side of the depression. The break in topographic contour line trend is where the fill should end, as the boring data demonstrate, which also must be east of the eastern end of the retaining wall. The edge of fill line between the homes at 18 and 16 Marlboro is also coincident with an increase in topography on the latter property that also parallels the property line. In addition, 16 Marlboro lies on the generally higher elevation terrain within the eastern halves of Blocks P and E farther north. Therefore, additional investigation of this property is not warranted.

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64 Marlboro

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Comment: Refuse fill identified in N1010 from .4 to 1.2 ft, at N1002 disturbed soil fill .5 to .8 ft, a void space 1.5 3.0 ft.

Need to substantiate no fill present on site.

Response: The historical record documents the apparent creation of the Newhall Street fill area from sand borrowing used to improve the roadway through the swamps north of Newbury. The 1877 Coastal Survey map shows a natural depression coincident with just the west side of Block P and the northwestern corner of Block Q. This original depression was expanded into the roughly rectangular fill area along the whole eastern side of Newhall Street. A natural consequence of the engineering of the final Newhall Street grade would be the placement of a minor thickness of fill under the street, with its western edge along the street's western right-of-way. This conceptual model is largely confirmed by the many borings along the west side of the street, including transect N1007 – N1010 on the eastern edge of the property.

Boring transect N1001 – N1003 shows a western extension of the fill boundary line at 438 Newhall Street. The transect was done along the driveway, which at other properties is typically underlain by a minor amount of fill, consistent with normal construction practices. Consequently, the northern side of the fill line extension was drawn coincident with the northern driveway/property line. The southern edge of the fill line extension was drawn coincident with the southern edge of a concrete walkway around the house. These development details are missing from the Sheet 2 of the Addendum and will be added.

Any change to the edge of fill line would bring it into 64 Marlboro, which currently is not proposed for remediation. To verify this, Olin proposes a boring just north of the driveway at 438 Newhall Street.

82 Marlboro and 168 Shepard

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Comment (82 Marlboro): Boring needed on 82 Marlboro to delineate western edge of Isolated fill area M02 to substantiate no fill is present on site.

Comment (168 Shepard): Need boring along north property line to delineate S edge of M02. Need to substantiate no fill is present at site.

Response: Because Olin could not obtain access to further delineate the disturbed soil fill in the dog run area in the southern portion of 80 Marlboro, Olin proposes adding two borings on southeastern edge of 82 Marlboro and one boring on the northeastern edge of 168 Shepard to constrain the boundaries of the inaccessible fill area.

90 Marlboro

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Comment: Need to substantiate no fill is present on site. Must evaluate significance of low resistance and odors noted at M1014 (possible sink hole).

Response: The field notes regarding the easy ground penetration and odors refer to boring M1015. The boring log states that there were “flies on ground, smells bad”. At the time, it was assumed that the odor and easy penetration was possibly due to a buried animal or some other animal byproduct. This boring did not recover any fill, but because the recovery was low another boring M1016 was drilled in the same depression and recovered three feet of native sand. XRF screening detected lead at only 32 ppm. Therefore, additional investigation of this property is not warranted.

121 Marlboro

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Comment: Need to substantiate no fill is present on site. K1047 adjacent to southern boundary fill found up to 5 ft in depth. K1047 need to be delineated for 121 Marlboro.

Response: The field notes and SI maps show only 0.9 feet of fill at boring K1047 underlain by the same native gravelly

sand at other borings in the area. Borings K1048 and K1049 already constrain the location of the edge of fill line in the area of 121 Marlboro as along the northern edge of Marlboro Street, consistent with the location and orientation of the line to the east and west of this parcel. Therefore, additional investigation of this property is not warranted.

108 Morse

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Comment: Need additional borings to substantiate edge of fill (drawn along the western property line) could extend onto west portion of parcel. Recommended additional sampling. Need to substantiate no fill present.

Response: The 1877 Coastal Survey map, when overlaid on the current road network, shows that the southern end of the depression that became the Bryden Terrace fill area extended just south into what is now the eastern part of the intersection of Morse and North Sheffield Streets. This area was apparently filled when Morse Street was extended eastward from Winchester by 1914. By 1949, when development of Blocks R and S was complete, North Sheffield Street was created and its northern grade excavated up to four feet below the former ground level, based on the topographic contour lines on either side of the north end of this road, to merge with the Morse Street grade.

The delineation of the edge of contiguous fill by borings at the eastern intersection of Morse and North Sheffield Streets and the western and northern portion of 116 Morse is consistent with the information provided by historic maps and aerial photographs. By convention, the fill boundary line was drawn about halfway between borings S1007 and S1025, which suggests the potential for a very minor amount of fill in the extreme northwest corner of 108 Morse. Boring S1007 is only about 8 feet from the western boundary of 108 Morse. The edge of fill line placement is not based on any field indications of fill. The line was drawn trending westward rather than southward from these two borings because borings within the southern portion of 116 Marlboro constrain the line to the western portion of that property and the lesser fill thickness found at the northern portion of this parcel suggests that the boundary line is close to these borings. Roadway grading along Morse has presumably squared off the edge of fill line in the area of 108 and 116 Morse and the position of the line there is also drawn about midway between borings F1016 (2.4 feet of fill) and boring 108-MS (no fill). Even if the line is drawn in a more southerly trend from borings S1007/25, it still potentially intersects only a minimal portion of 108 Marlboro. Therefore, additional investigation of this property is not warranted.

126 Morse and 56 North Sheffield

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Comment (126 Morse): Need to substantiate no fill is present at site. Need to evaluate significance or organic layers and exceedances and rule out that fill does not exist at depths up to or greater than 4 feet, need for additional investigation likely. Lead and arsenic PMC exceedances.

Comment (56 North Sheffield) : Need to substantiate no fill present on site, must include description of how north/south edge of fill in North Sheffield Street was drawn, may need additional boring in NE corner of parcel.

Response: The property inspection and DEP hand auger borings did not indicate the presence of fill. However, upon review of the logs and soil core photographs of borings 126-MS, R1010, R1011, and R1020, it appears that disturbed soil fill may be present in the northeast corner of 126 Morse. This potential condition is consistent with the recently obtained 1877 Coastal Survey map, which shows that the southern end of the depression that became the Bryden Terrace fill area extended into what is now the eastern part of the intersection of Morse and North Sheffield Streets. Olin proposes drilling five borings, including 56 North Sheffield, if necessary, to better delineate the edge of contiguous fill in this area.

161 Morse

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Comment: Need to substantiate no fill is present at site. Need to delineate As exceedance in E1008 (additional boring to north).

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Response: This parcel is not near the edge of well-delineated fill areas and is on an area that historic maps show as high ground. The property inspection did not observe surficial evidence of potential filling and no fill was found by boring E1008. While the arsenic concentration measured in the 0 to 3 inch sample slightly exceeded RDEC, the arsenic concentration from the 2 to 4 foot sample from the same boring was well below RDEC (0.9 mg/kg). A surficial sample exceeding RDEC for arsenic is consistent with data from non fill areas both within and outside the Consent Order study area and is not indicative of fill. DEP concluded in its June 14, 2001 "Newhall Street Neighborhood Rights-of-Way Sampling" report that "elevated concentrations of arsenic and some pesticides that were found in some surface soil samples are likely a result of homeowner pesticide application." Therefore, additional investigation of this property is not warranted.

274 Morse

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Comment: Need to substantiate no fill is present at site.

Response: A thin, isolated fill area apparently associated with road grading is present under the intersection of Morse Street and Shelton Avenue immediately northwest of 274 Morse. The property inspection found no visible indications of surficial fill and four borings drilled in the northwestern part of this parcel show that the fill is restricted to the rights-of-way. Therefore, additional investigation of this property is not warranted.

284-286 Morse

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Comment: Need additional borings to substantiate edge of fill (drawn along the Northeast corner of the property line, Isolated area K05) could extend onto Northeast portion of parcel. Need to substantiate why no remediation necessary.

Response: Information from borings along the northeast end of Shelton Avenue delineated a thin, isolated fill area under the rights-of-way consistent with road grading activity. Similarly, boring J1054 found 0.7 feet of disturbed soil fill (that is compliant for arsenic and lead) on the northwest end of the right-of-way that is not well delineated. The property inspection and two borings drilled farther west and south did not identify fill. Olin proposes drilling three borings within the northeast corner of 284-286 Morse and/or in the adjacent rights-of-way to delineate this isolated fill area.

290-292 Morse

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Comment: Need to substantiate no fill present on site. Fill may extend from adjacent parcel to the south. Southern fill boundary not delineated.

Response: The edge of fill line in this area is already well constrained by borings J1044, J1007, and J1046 drilled on properties to the west and south of 290-292 Morse. The property inspection found no visible indications of surficial fill and three borings drilled in the adjacent right-of-way and on 284-286 Morse found no fill. The 1877 Coastal Survey map also does not show the former kettle in Block J extending into this property. Therefore, additional investigation of this property is not warranted.

304 Morse

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Comments: Need additional borings to substantiate edge of fill (drawn along the southern property line) could extend onto south portion of parcel. Need to substantiate no fill is present at site.

Response: The edge of fill line in this area is already well constrained by multiple borings and/or DEP hand auger samples in the southern portions of 296 to 304 Morse, central 59 Edwards, and boring J1008 in the right-of-way in front of 59 Edwards Street. Note that boring J1008, which found no fill, is not paired with another boring to the south and thus the edge of fill could be actually further south but was conservatively drawn near boring J1008. Also note that the edge of

fill at 300 and 304 Morse and 59 Edwards is coincident with the edge of slightly higher topography under the two Morse Street properties and inspection of these two properties found no visible evidence of the potential presence of fill, except for a small surface depression in southeastern 304 Morse. Boring J1051 was drilled in this depression and did not find fill. The 1877 Coastal Survey map also does not show the former kettle in Block J extending into these properties. Therefore, additional investigation of this property is not warranted.

452 Newhall

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Comment: Need to delineate fill line along the eastern boundary. Need to substantiate no fill is present at site.

Response: The historical record documents the apparent creation of the Newhall Street fill area from sand borrowing used to improve the roadway through the swamps north of Newbury Street. The 1877 Coastal Survey map shows a natural depression coincident with just the west side of Block P and the northwestern corner of Block Q. This original depression was expanded into the roughly rectangular fill area along the whole eastern side of Newhall Street. A natural consequence of the engineering of the final Newhall Street grade would be the placement of a minor thickness of fill under the street, with its western edge along the street's western right-of-way. This conceptual model is largely confirmed by the many borings along the west side of the street.

DEP boring 452-NH, located in the Newhall Street right-of-way just east of 452 Newhall, identified 2 feet of "dark brown coarse gravel", which was interpreted in the SI as disturbed soil fill and is consistent with roadway grading. Borings N1004 and N1005 in the Marlboro Street right-of-way to the north and borings N1007 to N1009 on the parcel to the south did not intersect fill. Collectively, these borings constrain the western edge of the Newhall Street fill area. Also, inspection of the property did not find visible evidence of the potential presence of fill. However, to verify the edge of fill, Olin proposes drilling a boring within the eastern edge of 452 Newhall just west of boring 452-NH.

602 Newhall

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Comment: Need additional borings to substantiate edge if fill (drawn along the Northwest corner of the property line) could extend onto Northwest portion of parcel. Need to substantiate no fill is present at site.

Response: The edge of contiguous fill line does not intersect 602 Newhall Street, but does intersect the northwest corner of 596 Newhall. A portion of the latter property is located west of 602 Newhall Street. Therefore, additional investigation of this property is not warranted.

650 Newhall

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Comment: Need additional borings to substantiate edge of fill (drawn along the southwestern and northwestern corner of the property line) could extend onto northwest and southwest portion of parcel. Need to substantiate no fill is present at site.

Response: The eastern edge of fill area T02 is not well constrained. It was interpolated half way between borings T1089/T1083 (up to 2.5 feet of fill) and borings T1008/T1010 (no fill). Olin proposes three borings along the northern and eastern portions of 322 Augur to better delineate the edge of fill area T02.

18 North Sheffield

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Comment: Isolated area R02 may extend onto this property. Need to substantiate no fill is present on site.

Response: The property inspection did not observe surficial evidence of potential filling save for minor surface debris. Three borings on the property, including within the area where debris was reported, did not find fill. While the small, thin

isolated fill area R01 to the southwest is already well delineated, Olin proposes drilling an additional boring in the extreme southwestern corner of 18 North Sheffield to verify the edge of the isolated fill area.

32 and 44 North Sheffield

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Comment (32 North Sheffield): Additional investigation to establish R03 does not extend onto parcel. Need additional boring in NW corner to delineate R-03 does not extend onto parcel. Need to substantiate no fill is present at site.

Response:

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Comment (44 North Sheffield): Need additional boring in W portion of parcel to ensure R03 does not extend onto W portion of parcel. Need to substantiate no fill is present at site.

Response: Isolated fill area R03, located to the northwest and southwest of these parcels, is not well constrained to its north and south. The edge of fill line is drawn halfway between DEP hand auger borings in the east-sloping backyard of 981-79 Winchester and borings R1009, R1017, R1018, and R1023 on adjacent properties to the north and south. To better constrain the limits of isolated fill area R03, which is based largely on the shallow hand auger borings, Olin proposes drilling six borings in the backyards of both 981-79 and 985 Winchester.

960 Winchester

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Comment: Need to substantiate no fill is present on site.

Response: Two borings (Q1019 and Q1020) were drilled at this parcel, including at a surface depression in the backyard, which was the only feature the inspection suggested may indicate the potential presence of fill. While trash (shingles, glass) was observed on the ground, no fill was found in the borings. Therefore, additional investigation of this property is not warranted.

965 Winchester

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Comment: Need to substantiate no fill is present on site.

Response: Inspection of this property did not observe surficial evidence of potential filling other than stressed grass, which is common at both fill and non-fill areas. Isolated fill areas R01 and R02, located beyond the southeast and northwest corners of this parcel, are well delineated except for the southern end of R02. Olin proposes drilling two borings in the front yard of 965 Winchester and adjacent right-of-way to better constrain the limits of fill within R02.

972-974 Winchester

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Comment: Isolated fill material Q02 may extend onto this property. Need to substantiate no fill on site.

Response: Isolated fill area Q02 is very well defined by six borings drilled within an area measuring only about 15 by 37 feet, including boring Q1048 immediately adjacent to the southern boundary of 976 Winchester. Inspection of 972-974 Winchester did not observe surficial evidence of potential filling. Therefore, additional investigation of this property is not warranted.

1028 and 1032 Winchester

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Comment (1028 Winchester): Boring E1051 located at the site has fill at 1 foot. The fill may extend onto this property. Need to verify that the fill observed in boring E1051 which is located north of the property at the adjacent parcel does not extend onto this property. Need to substantiate no fill present on site.

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Comment (1032 Winchester): Need to verify that isolated area E02 does not extend onto this property. Boring E1048 outside the fill line has 1-foot of disturbed soil. Need to substantiate no fill is present at site.

Response: According to the logging notes in field book 3, page 32, boring E1051 on 1030 Winchester penetrated dark brown silty fine to medium grained sand with a trace of fine gravel from 0 to 0.9 feet underlain by red-brown silty fine to medium grained sand with a trace of fine to medium grained gravel. These descriptions indicate typical natural topsoil overlying the widespread native sand present in historically upland areas such as the eastern half of Block E. No fill was logged. Perhaps the comment on Table 1 inadvertently refers to the reference in the field book, directly above the notes for boring E1051, to the collection of isolated fill sample E1050S1 from 0 to 1 foot at boring E1050.

The SI report did incorrectly identify boring E1048 on 1030 Winchester as penetrating only native sand when the field notes indicate one foot of surficial disturbed soil fill, consistent with three other borings within the back yard. Inspection of 1030 Winchester found a surface depression, debris, settlement, and some bare areas in the back yard, which appears to be mostly filled (area E02). With the correction to boring E1048, the northwestern edge of this fill area is not well constrained; therefore Olin proposes drilling a boring in the southwestern edge of 1032 Winchester west of boring E1059 to further delineate fill area E02. Another boring is also proposed on the northern edge of 1028 Winchester, between borings E1045 and E1047.

1042 Winchester

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Comment: E1037 had 1 foot of fill and is located in ROW. Need to delineate to verify fill does not extend onto the eastern portion of the site. Need to substantiate no fill present on site.

Response: The inspection of 1042 Winchester did not observe surficial evidence of potential filling. Only a surface depression was observed under swing set. The boring E1038 in the driveway found no fill. While there is fill in right-of-way boring E1047, it is located east of the retaining wall that wraps around the eastern and northern edges of northeastern Block E and separates historic high ground from the filled low lying areas to the east and north. Therefore, additional investigation of this property is not warranted.

ATTACHMENT 2

SUMMARY OF EXTENT OF FILL BASED ON HISTORICAL DOCUMENTS

The description of the extent of fill based on historical documents presented below is based largely on a previous description presented in the March 2006 Supplemental Investigation Addendum Report for the Newhall Non-Public Properties. Information has been added to the description based on a recently obtained 1877 Coastal Survey Map (Sheet 2). Copies of the other figures and documents referenced in this description are contained in the Supplemental Investigation Addendum Report. Olin has extensively reviewed existing documentation regarding this part of Hamden. This review included searching many of the local libraries, historical collections and Town archives and records to get a better understanding of the topography and filling activities in the area, searching through copies of decades of the local newspapers, including the New Haven Register, and reviewing dozens of old aerial and other photographs of the area. Olin has an excellent understanding of the fill activities, when they occurred, and their scope.

Numerous historical documents, maps, and aerial photographs document the presence of former low-lying areas in the Non-Public Properties Study Area that were subject to filling. Most of these are listed on Sheet 1 of Olin's January 2004 Supplemental Investigation Work Plan and either describe or depict the former extent of low-lying areas or activities that resulted in the contiguous fill areas. In addition, a recently obtained, very detailed 1877 Coastal Survey Map provides additional information on the location and shape of major, natural topographic depressions prior to filling.

Consequently, properties not within or adjacent to these historically described or depicted areas are not within the contiguous fill areas detailed below. They may, however, have local, thin and undocumented isolated fill areas, or if in block A may have filling adjacent to the northern boundary of that block. In particular, the 1877 map also shows an absence of topographic depressions anywhere outside the known contiguous fill areas, which supports the field investigation findings that isolated fill areas are local, thin, and/or related to later development. This information is especially relevant to block T, which was not subject to descriptions in historic written documents and where development predates the earliest aerial photographs.

Southwest Satellite Area

As described in Olin's Supplemental Investigation Report, this contiguous fill area is not depicted by late 19th century topographic maps and post-1934 aerial photographs. However, written documents post-dating the maps indicate that these three blocks were fill areas. A long-time resident describes "marshy ground of perhaps four acres" present in 1914 at a location consistent with the Southwest Satellite Area, which was a mosquito breeding ground. In the 1916 Hamden Annual Report, Health Officer G. H. Joslin reported that, "The very large [mosquito] breeding place on the corner of St. Mary and Morse Streets is nearly filled in." Although the exact corner of those streets was not specified, independent historical research done in the 1970s noted that during World War One, the block bordered by Morse, Edward, Goodrich and St. Mary Streets, was raised 15 feet and a skating pond existed there until 1917. Town records also show that by 1917 a public dump was established in Highwood on Shelton Avenue between Goodrich and Morse streets. Residents were permitted to dump "rubbish, tin cans, etc.", but disposal of "garbage, carcasses of dead animals, decaying vegetables, etc." was prohibited. [1917 Hamden Annual Report, pg. 36]. A smaller third block (L), located between Shelton Avenue and Butler, Goodrich, and Marlboro Streets, is referred to as containing a "coke lot". The New Haven Water Co. reported in its December 1, 1917 Monthly Report that a surface water drain was installed at the corner of St. Mary and Goodrich Streets that discharged to the far corner of Newhall St. swamp (to the northeast). In 1919, St. Mary, Morse and Edwards Streets were raised and a storm drain was completed.

The 1877 Coastal Survey map very accurately depicts the three depressions that constitute the Southwest Satellite fill area that was characterized by the Initial and Supplemental Investigations through the use of borings and test pits. Apparently, only the edges of the fill area have been modified from the shapes shown on this map, largely due to road work and land development activities.

Newhall Street Fill Area

The Newhall Street Area lies within blocks E, P, and Q along the east side of Newhall Street. The 1892 topographic map shows blocks P and Q defined by existing streets and several buildings in block P. The 1892 and 1914 topographic maps show blocks E and B as one block, without Newbury Street. A closed, circular contour line, with vegetation indicated on the 1914 map, lies in the eastern part of block E, indicating the historic presence of the current high ground there, with a topographic low immediately to the west along Newhall Street. The historic presence of this depression, and another at the western end of block Q, suggests that the fill area was once a contiguous, northward-sloping swale, but not deep enough to be resolved by the 20-foot contour interval of these old topographic maps. The recently obtained 1877 Coastal Survey map shows a north-south-oriented, elliptical depression in the western portion of blocks P and Q, consisted with the later topographic maps described above, but not nearly as extensive as the fill area mapped by the Supplemental Investigation.

Included in the Town of Hamden Phase I ESA Report are anecdotal reports from an “old timer” who lived in the neighborhood in the 1920s and 1930s. He states that filling occurred in “the area from Marlboro Street to Mill Rock Road bordering on Winchester Ave. on the east side to Newhall Street on the west side.” Exceptions were properties along the east (Winchester Ave.) side of these blocks. Videotaped interviews of other knowledgeable residents conducted by CTDEP suggest that this area may have once been a sand quarry. The sand was evidently used to improve and elevate the portion of Newhall Street that traverses the former swamps within the Public Properties.

Filling and subsequent development of this area apparently started in the western end of block P and northwestern-most part of block Q, with homes there dating from 1924. By the first aerial photographs in 1934 this block is already filled and developed; however, depressions still existed to the immediate north and south. To the north, filling in the western part of block E began before 1934 and apparently ended by 1943. In 1934, the western part of the block is slightly lower than Newhall Street and the gray tones and patterns seen on the aerial photographs suggest that the western part of this block has also been filled. By 1943, the western part of this block has been brought up to surrounding road level, and the ground is covered with shrubs. Development of this part of the fill area began in 1944 with the home at 499 Newhall Street and was completed by 1957.

The depression at about elevation 50 feet in the southwestern part of block Q was vacant in 1934, similar to the topography to the east of this parcel and sloping very steeply up to Newhall St. to the west. In 1941 what is now the rectory at the Christian Tabernacle Baptist Church was constructed, with some local filling of the depression under and around the building. Additional filling of the depression apparently took place when the rest of the church was built in 1975, with about 3 to 5 feet of fill added up to the rear property line. A 2 to 3-foot-high escarpment remains along the southern and eastern property lines.

The 1877 and 1914 maps and the aerial photos show that the eastern part of block E has always been high ground (up to elevation 59), mostly vacant and heavily wooded until gradually developed during the 1930s to 1963. The high ground slopes down to the north from Morse St. In 1934 what is now Newbury Street is shown as an unpaved path cut into the toe of this slope. Aerial photographs from 1943 onward show topography that is consistent with current topography. A low retaining wall is present along the south side of the eastern part of Newbury Street and around the corner along Winchester Avenue where these roads were cut into the toe of the sloping hill.

Throughout the period of maps and aerial photographs, the topography and degree of development on the west side of Newhall Street is consistent with today’s appearance. Therefore, if some filling took place on the west side of the street, then the historical record does not document it.

Bryden Terrace Fill Area

This fill area is generally depicted on the 1892 and 1914 topographic maps as a wooded depression. However, the very detailed 1877 Coastal Survey map shows a topographic depression located east of Winchester Avenue and extending south from Mill Rock Road to just south of an eastward extension of Morse Street. Wadsworth Street is now located just

east of this depression. Except for the construction of this road and extreme southern end of the depression, where Morse Street and North Sheffield Street now intersect, the historic topographic north, east, and south of this depression is consistent with current topography.

Various historic documents refer to the filling activities east of Winchester Avenue and are consistent with the historic maps. Long time area resident John J. Carbrey reported in the December 15, 2000 New Haven Register that the town dump was located on the east side of Winchester Avenue from Morse Street to Mill Rock Road and part way up towards Prospect Street. The area east of Winchester Ave. between Morse and Goodrich Streets (blocks R and S) was solid ground and had been a golf course. Because most of the filling took place after 1934, the most detailed historic information comes from aerial photographs.

The 1934 aerial photo shows this area as mostly wetland undergoing filling from the northwest, southwest, and south. No homes are present and Winchester is an unpaved path that does not extend north past what will be the western extension of Bryden Terrace. A black area interpreted to be water occupies the central and northwestern part of the blocks and merges with a channel leading westward through what will be Rochford Field (block B).

Land just west of Wadsworth St. (an unpaved road) is mostly dark gray wetland vegetation with some ditching that grades into the central black area, and thus has elevations sloping up from 38 feet to less than about 45 feet. Wadsworth St. itself consists of a level path between a low escarpment on the east (cut into higher ground) and an embankment on the west (fill spoils deposited in the lower wetlands).

Gray, sharp-edged lobes of fill occupy the southern and western sides of block F and terminate at Winchester Ave., Morse, and Wadsworth streets.

No filling is apparent immediately west of Winchester Ave. (block E), east of Wadsworth St., or south of Morse (blocks R and S), where there are fields, homes, and wooded areas with the same topography as today. Another unpaved path extends northeastward from the intersection of Winchester and Morse into the water. This path and Winchester Ave. are shown on the 1877, 1892 and 1914 topographic maps as extending north to Mill Rock Road; however their northern portions were under water on the early spring date of the 1934 aerials.

The 1939 oblique aerial photo shows the future residential parcels as vacant land, indicating that filling is largely complete. This aerial shows the Mill Rock Park parcel as very light-toned, suggesting filling and disturbance rather than wetland/swamps. The 1939 oblique taken from the top of Mill Rock shows an active fill area within the future Bryden Terrace Area, with a smoke plume from a fire at the southern edge of the fill area. The future Mill Rock Park (block D) area is obscured by trees, but both areas are seen in the 1943 vertical and 1946 oblique photographs as completely filled and graded to road level.

The 1949 topography of the land east and south of the fill area is consistent with today's and includes a heavy, continuous cover of large trees and consistent gray-tone. These topographic relationships and other features suggest that filling contiguous with that on Rochford Field and Mill Rock Park covers most of these parcels, but does not appear to extend past Wadsworth to the east and Morse on the south.

Residential development occurred during the late 1940s to late 1950s. In the 1949 aerials, the western extension of Bryden Terrace between blocks C and F did not exist and the fill area was undeveloped except for 10 homes along the southern edge and corners (12 Wadsworth, 95-135 Morse, 1019-1027 Winchester). In 1951 blocks D and F appear similar to 1949, except that leafed out shrubs and small trees obscure the surface details. By 1957, Bryden Terrace extended westward through the fill area to Winchester Avenue, and by 1959 all of the homes present there today are visible in this and subsequent photos.

ATTACHMENT 3

RESPONSES TO COMMENTS ON TABLE 3

For most of the properties listed, Olin has provided information documenting why no sampling is needed at each of the properties. Specifically, the properties do not overlie an area of contiguous or isolated fill. Presence of former wetland areas or historically placed waste materials are not indicated by historical evidence, reports from residents, inspections, and investigation results from adjacent properties. A summary of the extent of fill based on historical documents is included as Attachment 2. Additional responses for each property in question are provided below. Olin is proposing to re-inspect three of the properties and if warranted, conduct limited additional sampling to visually evaluate whether fill is present (without chemical analysis of samples).

99 Goodrich

-

Comment: Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling, only a sparse vegetation area in the backyard and a rocky area in southeastern portion of the property. The property owner stated nothing would grow in this rocky area. Borings were drilled in the sparse vegetation and the rocky area. No fill was found. This property is bounded by the study area limits to the east and south. An isolated fill area to the north was found on 14 Prospect; borings delineated the isolated fill area within that property. Therefore, remediation of this property is not warranted.

105 Goodrich

-

Comment: Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling; only two bare spots on a footpath to the house. The owner had no comments about this property. Borings on the property to the east (99 Goodrich) found no fill. Therefore, remediation of this property is not warranted.

117 Goodrich

-

Comment: Need to review property assessment field sheet to determine if fill unlikely to be present. Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling, only a bare spot and an area of sparse vegetation in a dog run area. Borings on the adjacent property to the west (123 Goodrich) did not find fill. An isolated fill area to the northwest was found on 10 North Sheffield; borings delineated the isolated fill area within that property. Therefore, remediation of this property is not warranted.

149 Goodrich

-

Comment: Inspection report shows bare spot northeast corner of property. Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling, only an area of sparse vegetation in the backyard. Borings to the west, north and east on adjacent properties found no fill. There is a small isolated fill area on 155 Goodrich; borings delineated the isolated fill area within that property. Therefore, remediation of this property is not warranted.

159 Goodrich

-
Comment: Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling, only an area of sparse vegetation in the backyard by the garden. There is a small isolated fill area on 155 Goodrich; borings delineated the isolated fill area within that property. In addition, the Newhall Street fill area is located to the west of this property. Borings to the west delineated that contiguous fill area. Therefore, remediation of this property is not warranted.

233 Goodrich

-
Comment: Need to substantiate why no remediation necessary.

Response: The property inspection noted this site was entirely bare. A dog tie was noted and there were many holes evidently dug by a dog. There was significant household trash throughout this property. No fill was found in boring M1029 drilled in the middle of the back yard. In addition, borings to the west on 241 Goodrich, to the north on 156-158 Shepard and to the east at 229-231 Goodrich did not find fill. Therefore, remediation of this property is not warranted.

311 Goodrich

-
Comment: Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling. Borings on the adjacent property 303 Goodrich to the northeast, along the rights-of-way to the east and south of 311 Goodrich, and on 319 Goodrich to the west and northwest did not find fill. Therefore, remediation of this property is not warranted.

323 Goodrich

-
Comment: Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling, only sparse vegetation located on the northwestern portion of the property in an area of overhanging vegetation. The Southwest Satellite contiguous fill area is north of this property and isolated fill area H01 is located northeast of this property. Borings on adjacent properties delineated both fill areas within those properties. Borings to the west (325 Goodrich), north (17-19 St Mary), and to the northeast (321 Goodrich) found no fill. Therefore, remediation of this property is not warranted.

325 Goodrich

-
Comment: Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling. Two borings located in the backyard found no fill. In addition, there was no fill found in the post-holes during installation of a fence along the west side of the property. Therefore, remediation of this property is not warranted.

11 Marlboro

-
Comment: Need to substantiate why no remediation necessary.

Response: The property inspection noted two bare spots and a garden area. The owner mentioned abnormal soil color and high lead content from previous soil results. Boring P1029 was drilled in this garden area and no fill was found.

Laboratory analytical results from P1029 showed no lead or arsenic exceeding criteria. One other boring from this property was drilled *and* no fill was found. No fill was found in borings to the east and north (984 and 994 Winchester) and west (17 Marlboro). The Newhall Street fill area is located to the west of this property. Borings to the west delineated this contiguous fill area. Two isolated fill areas exist on multiple properties to the north of this property. Borings delineated and restricted these fill areas to properties to the north. Therefore, remediation of this property is not warranted.

84 Marlboro

-

Comment: Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling, only two bare spots in the backyard due to pedestrian traffic. Borings on the property to the west delineated a small area of isolated fill restricted to that property. No fill was found in borings to the south on 168 Shepard Street. Therefore, remediation of this property is not warranted.

125 Marlboro

-

Comment: Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling, only one bare spot in the backyard by a birdfeeder. Two borings were drilled on the property and no fill was found. The Southwest Satellite fill area is located to the west and south of this property. Borings to the west and south of 125 Marlboro delineated that contiguous fill area. Therefore, remediation of this property is not warranted.

102 Morse

-

Comment: Need to substantiate why no remediation necessary.

Response: The property inspection noted one bare spot and three areas of sparse vegetation. One boring was drilled on this property and no fill was found. Borings on adjacent properties delineated isolated fill areas to the east, south east and south within those properties. The Bryden Terrace fill area is north of this property. Borings to the north and west delineated that contiguous fill area. Therefore, remediation of this property is not warranted.

160 Morse

-

Comment: Need to substantiate why no remediation necessary.

Response: The property inspection noted one area of sparse vegetation and three bare spots. These bare spots are below where a car was parked and underneath a swing set. Three borings were drilled on the property, including in one of the bare spots, and no fill was found. Borings on adjacent properties to the east, south, and west found no fill. Therefore, remediation of this property is not warranted.

622 Newhall

-

Comment: Need to substantiate why no remediation necessary.

Response: The property inspection noted one area of sparse vegetation in the backyard. Borings to the north, west, and south found no fill. The Augur Street fill area is located to the west of this property. Borings to the west of 622 Newhall delineated that contiguous fill area. Therefore, remediation of this property is not warranted.

626 Newhall

-
Comment: Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling, only one bare spot located in the backyard. Five DEP borings on this property found no fill. The Augur Street fill area is located to the west of this property. Borings to the west delineated this contiguous fill area. Therefore, remediation of this property is not warranted.

630 Newhall

-
Comment: 1' fill present in 1067 located in Remington Street. Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling. None of the borings drilled on the property found fill. Borings on adjacent properties to the north and south found no fill. The Augur Street fill area is located to the west of this property. Borings to the west delineated this contiguous fill area. One boring was found to contain 0.9 feet of disturbed soil fill along the western boundary of the property. This boring is along the road and not on the property. Surrounding borings found no fill. Therefore, remediation of this property is not warranted.

460-462 Newhall

-
Comment: Isolated area K04 may extend on to the Northwest corner of this property. Need to substantiate no fill is present at site.

Response: The property inspection noted one area of sparse vegetation in a shady area and two bare spots near a basketball hoop. A boring was drilled in one of the bare spots and no fill was found. An area of isolated fill is located on the property to the north (466 Newhall); borings delineated this fill area within that property. The Newhall Street contiguous fill area is located to the east; borings in the right-of-way show that the fill does not extent westward onto this property. Therefore, remediation of this property is not warranted.

15 North Sheffield

-
Comment: Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling. Only a 3-foot-diameter surface depression on the south side of the house and four bare spots were found in shaded or recently disturbed areas. No evidence of fill was found on surrounding properties, except for some isolated fill in the front yard of 14 Prospect Lane, which was delineated by borings within that property. Therefore, remediation of this property is not warranted.

23 North Sheffield

-
Verify S05 does not extend onto parcel. Need to verify the debris in the backyard. Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling, except for some debris in the northeastern portion of the property. The owner reported bricks dug up in this area. One boring was drilled in this debris area and no fill was found. There are borings along the northern property boundary on the adjacent parcel that found no fill. Isolated fill S05 is located to the north of this property; borings delineated this fill area within adjacent properties. Therefore, remediation of this property is not warranted.

26 North Sheffield

-

Comment: Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling, only one bare spot located in the backyard. The owner reports not encountering any debris. A well boring in the right-of-way to the east did not find fill. There is an isolated fill area to the southwest on multiple properties; borings delineated and restricted this fill area to those properties. Therefore, remediation of this property is not warranted.

38 North Sheffield

-

Comment: Review R1014, R1015, R1016 to verify remediation not necessary. Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling, only three areas of sparse vegetation in the side and backyard. Three borings on the property, including one on the western edge near an area of isolated fill on the property to the west (981-79 Winchester), did not find fill. Therefore, remediation of this property is not warranted.

49 North Sheffield

-

Comment: Fill line could extend on southern boundary. Need to substantiate why no remediation is necessary.

Response: The property inspection did not observe surficial evidence of potential filling, only one bare spot in the front yard. The owner reports finding bottles and coins in the yard. Two borings on the southern boundary of the property found no fill, delineating the northern extent of isolated fill area S05. Borings on 108 and 116 Morse Street delineated the Bryden Terrace contiguous fill area to the north. Therefore, remediation of this property is not warranted.

50 North Sheffield

-

Comment: Need to substantiate why no remediation necessary. This must include assessment of significance of debris noted in northwest corner of parcel.

Response: The property inspection noted debris in the northwest corner of the property. This debris consisted of concrete and asphalt fragments on the surface. A boring was drilled at this location and no fill was found. Five additional DEP borings on the property and a boring to west on 993 Winchester did not find fill. Therefore, remediation of this property is not warranted.

20 Prospect

-

Comment: Need to substantiate why no remediation necessary.

Response: The property inspection noted one area of sparse vegetation along the northern property line. Two bare spots were noted around a footpath leading up to the front door below a large maple tree. One boring to the east in the right-of-way found no fill. There are two areas of isolated fill near this property. One is to the south and the other is to the north. Borings delineated these fill areas within properties adjacent to 20 Prospect. Therefore, remediation of this property is not warranted.

44 Prospect

-

Fill could possibly extend on western boundary. The western fill line is on the property line. Need to substantiate why no remediation is necessary.

Response: The property inspection noted one bare spot along the eastern property line where large shrubs were recently removed. The owner reported no evidence of fill. One boring was drilled in this bare spot and no fill was found. Another minor bare spot was noted in then northwest corner of the property. There are two isolated fill areas in proximity to this property. One is to the north and the other is to the south. Borings delineated these fill areas within the adjacent properties. Therefore, remediation of this property is not warranted.

5 Remington

-

Comment: Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling. A boring on the property found no fill. Borings delineated the Augur Street fill area to the west and south. Therefore, remediation of this property is not warranted.

9 Remington

-

Comment: Need to substantiate why no remediation necessary.

Response: The property inspection noted a bare spot along the western property line next to the right-of-way caused by a parking space. An area of stressed vegetation was also noted in the northeastern portion of the parcel next to the garden. Borings to the north, east and south did not find any fill. The Augur Street fill area is located to the west. Borings to the west delineated this contiguous fill area. Therefore, remediation of this property is not warranted.

509-511 Shelton

-

Comment: Verify debris in back yard (east) to verify remediation not necessary. Visual inspection reports debris at the surface, bare spots, stressed vegetation, coal, brick and glass. Need sampling to confirm no fill is present at this parcel.

Response: The property inspection noted coal in a soil pile next to an animal burrow. Debris (brick and glass) were seen in the rear of the property. Olin proposes to re-inspect this property and may propose borings to investigate potential indicators of fill. There is an isolated fill area to the north under the intersection of Shelton Avenue and Morse Street. Borings delineated this fill area within the rights-of-way. The Southwest Satellite fill area is located to the southwest.

Borings to the southwest delineated this contiguous fill area.

515-517 Shelton

-
Comment: Need to substantiate why no remediation necessary.

Response: The property inspection only noted bare or sparse vegetation in shady areas and near a basketball hoop. There is an isolated fill area to the north under the intersection of Shelton Avenue and Morse Street. Borings delineated this fill area within the rights-of-way. The Southwest Satellite fill area is located to the southwest. Borings to the southwest delineated this contiguous fill area. Therefore, remediation of this property is not warranted.

156-158 Shepard

-
Comment: Need to substantiate why no remediation necessary.

Response: The property inspection noted surficial debris in the western part of the parcel. A boring was drilled at this location and no fill was found. There is an isolated fill area to the south on 150 Shepard. Borings delineated this fill area within 150 Shepard. Borings to the south found no fill. The Southwest Satellite fill area is located to the west. Borings to the west delineated this contiguous fill area. Therefore, remediation of this property is not warranted.

160-162 Shepard

-
Comment: no access

Response: No access was granted to investigate this property. Information from surrounding properties does not indicate the potential or actual presence of fill adjacent to the 160-162 Shepard property line. Therefore, remediation of this property is not warranted.

164-166 Shepard

-
Comment: Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling. Borings on the properties to the north and west found no fill. The Southwest Satellite fill area is located to the west. Borings to the west delineated this contiguous fill area. Therefore, remediation of this property is not warranted.

950 Winchester

-
Comment: Need to substantiate why no remediation necessary.

Response: The property inspection noted an area of stressed vegetation along the western property line due to a dog run and swing. There was also a surface depression north of the driveway. A boring was drilled next to this depression and no fill was found. The other two borings on this property found no fill. Therefore, remediation of this property is not warranted.

956 Winchester

-
Comment: Need to substantiate why no remediation necessary.

Response: The property inspection noted a surface depression in the backyard and stressed vegetation; however the

details were not mapped. Borings on adjacent properties to the north, west, and south found no fill. There was one small isolated fill area to the west at 155 Goodrich; borings delineated this fill area within 155 Goodrich. Olin proposes to re-inspect this property and may propose borings to investigate potential indicators of fill.

962 Winchester

-
Comment: Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling. Borings on adjacent properties to the west and south found no fill. Borings to the north found no fill. There was one small isolated fill area to the west at 155 Goodrich. Borings delineated this fill area within 155 Goodrich. Therefore, remediation of this property is not warranted.

966 Winchester

-
Comment: Field reconnaissance showed depressions, uneven terrain, bare spots and stressed vegetation. Soil boring are necessary to rule no fill is present on this property.

Response: The property inspection noted hummocky terrain/surface depressions that were not mapped. Bare spots and stressed vegetation were also noted but are typically due to shade and/or resident activity. Borings on properties to the north and south found no fill and delineated isolated fill areas do not extend onto this property. Olin proposes to re-inspect this property and may propose borings to investigate potential indicators of fill.

968-970 Winchester

-
Comment: Need to substantiate why no remediation necessary.

Response: The property inspection noted an area of stressed vegetation in the backyard where the trash bins are stored. A boring was drilled there and no fill was found. One other boring was drilled on the property and no fill was found. Borings to the north and west found no fill. An area of isolated fill was found to the east of the property. Borings delineated this fill area within the adjacent properties. Therefore, remediation of this property is not warranted.

993 Winchester

-
Comment: Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling, except for lack of grass along the southern property line. One boring was drilled on this property and no fill was found. There is an isolated fill area located to the south of this parcel. Borings delineated this fill area within adjacent properties. Therefore, remediation of this property is not warranted.

994 Winchester

-
Comment: Review P1029 (abnormal soil color) P1043 and P1032 to verify P01 and P02 do not extend and remediation not necessary. Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling. No fill was found in boring P1043 or in other borings on adjacent properties on all sides. These borings show that nearby isolated fill areas do not extend onto 994 Winchester. Therefore, remediation of this property is not warranted.

999 Winchester

-

Comment: Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling, except for a small area of stressed vegetation in the southwest corner of the property adjacent to the road right-of-way. Borings to the east and south found no fill. Therefore, remediation of this property is not warranted.

1005 Winchester

-

Comment: Need to verify the accuracy for the fill bound to the North. Boring F1021 had a black layer approximately at the 1.5 to 1.7 depth interval.

Response: The property inspection noted an area of stressed vegetation along the northern property boundary and bare spots underneath the trees along the northeastern fence. The Bryden Terrace fill area is located to the north and borings on both sides of Morse Street north of this property delineated the fill boundary. The log and photograph of boring F1021 shows a small body of black organic matter at 1.5 to 1.7 feet deep surrounded by red-brown sand. Therefore, another boring (F1022) was drilled immediately adjacent to boring F1021, but found only native red-brown sand. SOC concentrations in laboratory sample F1022S1 (1 to 3 feet deep) are compliant with RSR criteria. DEP boring 1005-WIN did not find fill, nor did two other borings to the east. Therefore, remediation of this property is not warranted.

1036 Winchester

-

Comment: Need to substantiate why no remediation necessary.

Response: The property inspection did not observe surficial evidence of potential filling, only two areas of sparse vegetation in the backyard. Two borings in the backyard and several borings just across the eastern, western, and southern property lines found no fill. There are two isolated fill areas in the vicinity of the property. Borings delineated these fill areas within adjacent properties. The Bryden Terrace fill area is east of this property. Borings to the east delineated this contiguous fill area. Therefore, remediation of this property is not warranted.