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249 Vanderbilt Avenue
Norwood, MA 02062
T: 781.278.3700
F: 781.278.5701
F: 781.278.5702
www.gza.com



MEMORANDUM

TO: Mill Creek Residential
Attn: Mr. Lars Unhjem

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

DATE: December 8, 2019

FILE NO: 01.0174087.10

RE: Response to Town of Weston LSP Review
Proposed Arsenic and Lead Soil Sampling Plan
751-761 Boston Post Road
Weston, Massachusetts

GZA is pleased to present this proposed sampling plan in response to the specific recommendations provided in the memorandum prepared by Arcadis US (Arcadis) and dated December 2, 2019. The Arcadis memorandum was prepared by Mr. James A. Luker, Jr., who is acting as the Licensed Site Professional (LSP) on behalf of the Town of Weston. The December 2 memorandum summarizes Arcadis' recommendations and opinions based on Mr. Luker's review of GZA's draft May 2019 Phase I Environmental Site Assessment of 751-761 Boston Post Road (the "Site").

In response to the detection of lead and arsenic in shallow soils within a portion of the Site used as an orchard, Arcadis recommended "a sampling plan to delineate the horizontal extent of the lead and arsenic. This should be prepared and submitted for review. Once approved and implemented, the final delineation of the impacted soil should be submitted."

To address this recommendation, GZA proposes to collect additional soil samples from the four areas noted in the figure attached to the Arcadis memorandum. Proposed sampling locations are presented on the attached sketch. At each location, GZA will collect shallow soil samples using a hand auger or shovel. The sampling equipment will be decontaminated between each sample location. Sampling locations will be located in the field using a Global Positioning System (GPS) unit. Soil samples will be submitted to ESS Laboratory of Cranston, Rhode Island (ESS) for analysis of total lead and total arsenic.

GZA's sampling will be limited to the top 6 inches of soil, where previous sampling has indicated the highest concentrations of lead and arsenic. GZA notes that at each previous location where samples from both the 0-6 inch and 6-18 inch intervals were analyzed, the concentrations of both parameters were higher in the shallower sample.

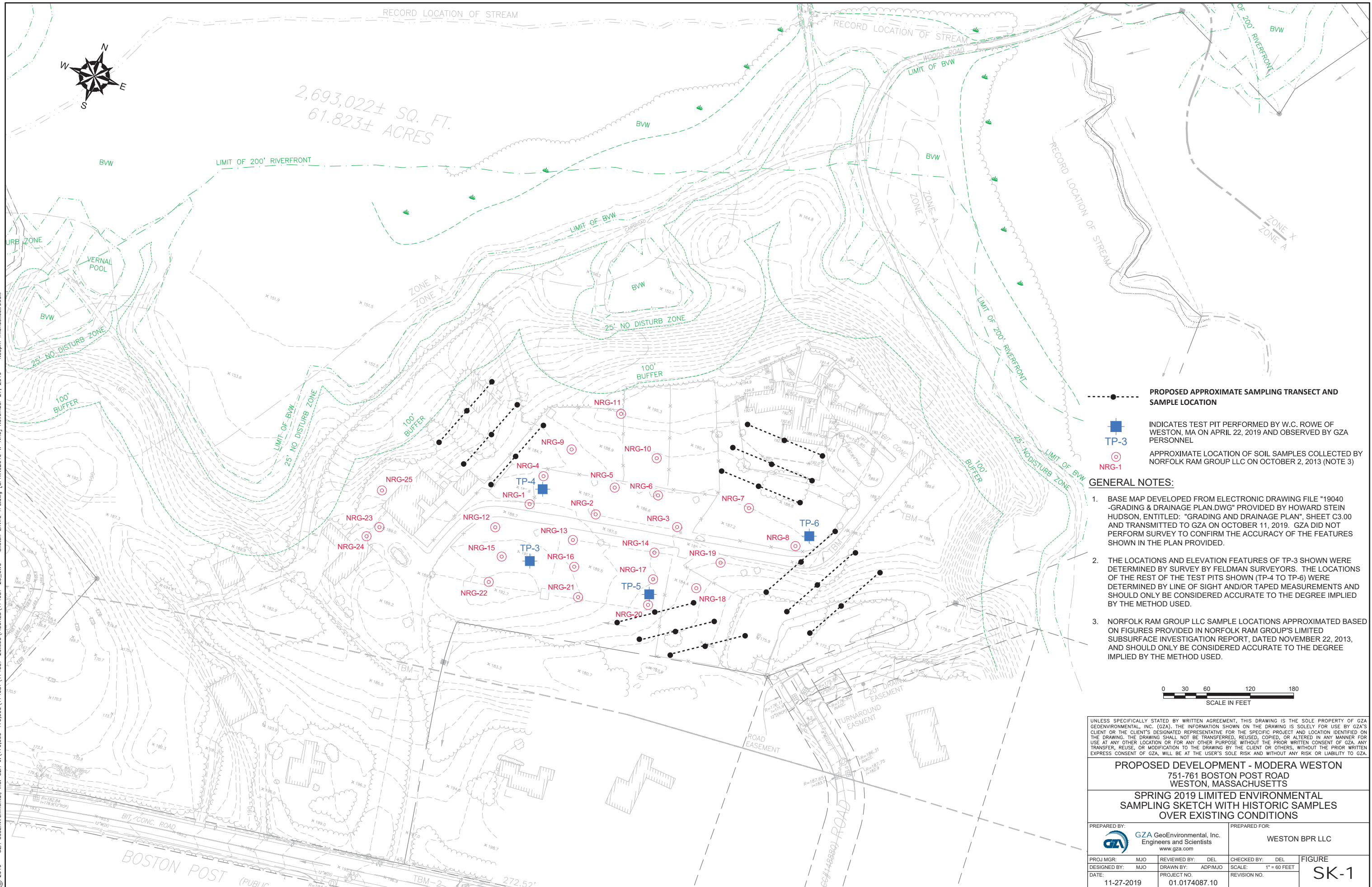
At each of the four sampling areas, GZA will collect up to nine samples (36 samples total). Samples in each area will be collected from three parallel transects approximately 50 feet apart (12 total transects, 3 samples per transect). Those samples collected from the transects



closer to the area of the former orchard will be analyzed first. If average concentrations of lead and/or arsenic in samples from the first transect exceed their respective Massachusetts Contingency Plan (MCP; 310 CMR 40.0000) Method 1 S-1 & GW-2/GW-3 Standards (residential standards), the samples from the next transect will be submitted for analysis. If average lead and/or arsenic concentrations in the second transect exceed their respective Method 1 S-1 & GW-2/GW-3 Standards, the samples from the third transect will be submitted for analysis. Should average lead and/or arsenic concentrations from the third transect exceed their respective MCP Method 1 S-1 & GW-2/GW-3 Standards, additional samples will be obtained from those areas following the methodology outlined above.

Results of the sampling and analysis will be tabulated and a figure outlining the area of elevated lead and arsenic (as compared to MCP Method 1 S-1 & GW-2/GW-3 Standards) will be developed. The table and figure will be provided to Arcadis for review, and will be incorporated into future soil management documentation developed for construction activities.

© 2019 - GZA GeoEnvironmental, Inc. GZA-U:\1704087-20.MXD\FIGURES\174087-20_GWC - Sketch Enviro TP-3.dwg [SPRING2019 W-NRG] November 27, 2019 - 4:58pm michael.ostrowski



2,693,022± SQ. FT.
61.823± ACRES



- PROPOSED APPROXIMATE SAMPLING TRANSECT AND SAMPLE LOCATION
- TP-3 INDICATES TEST PIT PERFORMED BY W.C. ROWE OF WESTON, MA ON APRIL 22, 2019 AND OBSERVED BY GZA PERSONNEL
- NRG-1 APPROXIMATE LOCATION OF SOIL SAMPLES COLLECTED BY NORFOLK RAM GROUP LLC ON OCTOBER 2, 2013 (NOTE 3)

- GENERAL NOTES:**
- BASE MAP DEVELOPED FROM ELECTRONIC DRAWING FILE "19040 -GRADING & DRAINAGE PLAN.DWG" PROVIDED BY HOWARD STEIN HUDSON, ENTITLED: "GRADING AND DRAINAGE PLAN", SHEET C3.00 AND TRANSMITTED TO GZA ON OCTOBER 11, 2019. GZA DID NOT PERFORM SURVEY TO CONFIRM THE ACCURACY OF THE FEATURES SHOWN IN THE PLAN PROVIDED.
 - THE LOCATIONS AND ELEVATION FEATURES OF TP-3 SHOWN WERE DETERMINED BY SURVEY BY FELDMAN SURVEYORS. THE LOCATIONS OF THE REST OF THE TEST PITS SHOWN (TP-4 TO TP-6) WERE DETERMINED BY LINE OF SIGHT AND/OR TAPED MEASUREMENTS AND SHOULD ONLY BE CONSIDERED ACCURATE TO THE DEGREE IMPLIED BY THE METHOD USED.
 - NORFOLK RAM GROUP LLC SAMPLE LOCATIONS APPROXIMATED BASED ON FIGURES PROVIDED IN NORFOLK RAM GROUP'S LIMITED SUBSURFACE INVESTIGATION REPORT, DATED NOVEMBER 22, 2013, AND SHOULD ONLY BE CONSIDERED ACCURATE TO THE DEGREE IMPLIED BY THE METHOD USED.



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| PROPOSED DEVELOPMENT - MODERA WESTON | | | |
| 751-761 BOSTON POST ROAD WESTON, MASSACHUSETTS | | | |
| SPRING 2019 LIMITED ENVIRONMENTAL SAMPLING SKETCH WITH HISTORIC SAMPLES OVER EXISTING CONDITIONS | | | |
| PREPARED BY: | GZA GeoEnvironmental, Inc. Engineers and Scientists www.gza.com | PREPARED FOR: | WESTON BPR LLC |
| PROJ MGR: MJO | REVIEWED BY: DEL | CHECKED BY: DEL | FIGURE |
| DESIGNED BY: MJO | DRAWN BY: ADP/MJO | SCALE: 1" = 60 FEET | SK-1 |
| DATE: 11-27-2019 | PROJECT NO: 01.0174087.10 | REVISION NO: | |