

MassDEP RTN 3-24070

Phase IV Status Report No. 19

Amesbury Former MGP Site,
Amesbury, Massachusetts

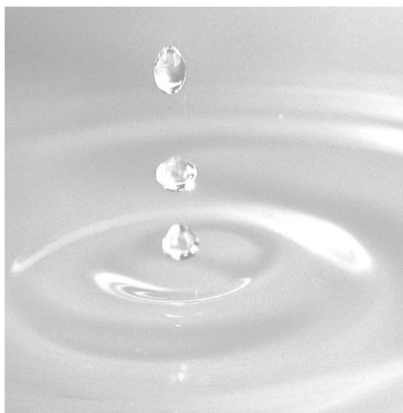
Submitted to:

Boston Gas Company d/b/a National Grid
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Waltham, MA 02451

Submitted by:

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July 23, 2026
Project No. 1804576



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NMT/JES/RSJ:jam

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Executive Summary

On behalf of Boston Gas Company d/b/a National Grid (National Grid), GEI Consultants, Inc., prepared this Phase IV Status Report No. 19 for the former Amesbury manufactured gas plant (MGP) in Amesbury, Massachusetts (the Site). The Massachusetts Department of Environmental Protection (MassDEP) has assigned Release Tracking Number (RTN) 3-24070 to the Site. GEI prepared this report to meet the requirements specified in Section 40.0877 of the Massachusetts Contingency Plan (MCP; 310 CMR 40.0000). Per 310 CMR 40.0877(3), a Phase IV Status Report is not required for the Site because the selected Comprehensive Remedial Alternative does not involve Active Operation and Maintenance; however, National Grid has elected to submit Phase IV Status Reports every 6 months to document ongoing activities (including permitting and design) associated with MGP-related impacts that were encountered during Phase IV remedy implementation at the Site.

The Site originally included a National Grid property (39 Water Street), a portion of a City of Amesbury property (39A Water Street), and a small, subdivided wetland portion of a privately-owned property (33R Oakland Street). In July 2015, the Site was expanded to include a small upland portion of the abutting property at 34-40 Water Street after dense non-aqueous phase liquid (DNAPL) as coal tar was encountered in a monitoring well.

On October 18, 2016, GEI submitted a Phase III Remedial Action Plan (RAP) Addendum and Phase IV Remedy Implementation Plan (RIP) on behalf of National Grid. The Phase IV remedy for the Site included excavating wetland soil and a small portion of upland soil, dredging sediment, restoring the wetlands, and implementing institutional controls. Construction associated with planned Phase IV remediation activities within the original Site boundary began in October 2016 and was completed in June 2017. However, in April 2017, while installing coir logs on the southeastern boundary of the work area, residual coal tar was observed in shallow wetland soil at the southeastern edge of the Site. This area was beyond the designed and permitted limit of work.

Between April 2017 and September 2024 GEI performed investigations at the Site on behalf of National Grid to delineate the extent of MGP impacts within the wetlands, mudflats, and Powwow River channel beyond the limits of the original Site boundary. On November 3, 2025, GEI submitted a Supplemental Phase II Comprehensive Site Assessment (CSA) Report on behalf of National Grid. Based on supplemental investigations, the Site was expanded further to include 28 additional properties along the Powwow River, some upstream of the former MGP but most downstream of the former MGP. The portion of the Powwow River within the Site includes approximately 150 linear feet upstream and approximately 5,150 linear feet downstream, including a former channel of the Powwow River that was filled during the 1960s as part of the Interstate 495 construction.

This report documents activities that were completed between January 1 and June 30, 2026. Assessment was completed in July 2025, so no assessment activities were conducted during this reporting period. A Phase III RAP Addendum and Phase IV RIP Addendum will be submitted now that assessment activities are complete. The Phase III RAP Addendum is anticipated to be submitted before Winter 2026. The specific timeframe for Phase IV remedial activities is uncertain at this time and depends on coordinating

property access, evaluating remedial action alternatives for the remainder of the disposal site, and permitting the selected remedial action. Activity and Use Limitations (AULs) may be recorded on the deeds of select properties or portions of properties within the disposal site prior to achieving a Permanent Solution. Recently, an AUL was recorded for a portion of the property at 34-40 Water Street that is within the site boundary.

1. Introduction

On behalf of Boston Gas Company d/b/a National Grid (National Grid), GEI Consultants, Inc., prepared this Phase IV Status Report No. 19 for the former manufactured gas plant (MGP) site in Amesbury, Massachusetts (the Site; Fig. 1). GEI has prepared the report to meet the requirements specified in Section 40.0877 of the Massachusetts Contingency Plan (MCP; 310 CMR 40.0000). The Comprehensive Response Action Transmittal Form (BWSC108) was submitted to the Massachusetts Department of Environmental Protection (MassDEP) electronically, and a copy is in Appendix A.

1.1. Purpose

The purpose of this Phase IV Status Report No. 19 is to document the operation, maintenance, and monitoring (OMM) activities conducted between January 1 and June 30, 2026. Per 310 CMR 40.0877(3), a Phase IV Status Report is not required for the Site because the selected Comprehensive Remedial Alternative does not involve Active Operation and Maintenance; however, National Grid has elected to submit Phase IV Status Reports every 6 months to document the ongoing activities (including permitting and design) associated with MGP-related impacts that were encountered during Phase IV remedy implementation at the Site.

1.2. Site Description

The former Amesbury MGP is located near the intersection of Water and Chestnut Streets in Amesbury, Massachusetts (Figs. 1 and 2) at approximately 42°51'20" north latitude and 70°55'29" west longitude. The Universal Transverse Mercator (UTM) coordinates are 4,746,579mN and 342,740mE. The Site originally included a National Grid property (39 Water Street), a portion of a City of Amesbury property (39A Water Street), and a small, subdivided wetland portion of a privately-owned property (33R Oakland Street) (Fig. 2). In July 2015, the Site was expanded to include a small upland portion of the abutting property at 34-40 Water Street after dense non-aqueous phase liquid (DNAPL) as coal tar was encountered in a monitoring well (ESS-5; Fig. 2).

On November 3, 2025, GEI submitted a Supplemental Phase II Comprehensive Site Assessment (CSA) Report on behalf of National Grid. Based on supplemental investigations performed between 2017 and 2024, the Site was expanded further to include 28 additional properties along the Powwow River, some upstream of the former MGP but most downstream of the former MGP. The portion of the Powwow River within the Site includes approximately 150 linear feet upstream and approximately 5,150 linear feet downstream, including a former channel of the Powwow River that was filled during the 1960s as part of the Interstate 495 construction (Fig. 2).

The Site includes the former Amesbury MGP, downstream wetlands, mudflats, and portions of the main channel of the Powwow River, most of which is privately owned. Due to the freshwater influence and tidal nature of the Powwow River, property boundaries along the Powwow River extend to either:

- The thalweg of the river when the mean low water (MLW) line (defined as El. -2.84) is below the riverbed, which is the case for properties upstream of and including portions of 222 Main Street and 27 River Street (Fig. 2); or
- The MLW line when it is above the riverbed, which is the case for properties downstream from 222 Main Street and 27 River Street (Fig. 2). The portion of the Powwow River below MLW is tidelands owned by the Commonwealth of Massachusetts.

All elevations in this report are based on the National Geodetic Vertical Datum 1929 datum (NGVD29).

Properties within the Site include single-family residential properties along Oakland Street and River Street; multi-family residential properties at 24 Oak Street and 32 Macy Street; commercial/industrial properties (and a children's daycare) at 34-40 Water Street, 7 Noel Street, and 58 Macy Street; an adult daycare facility at 8 Noel Street and a school at 222 Main Street; a portion of the Northbound and Southbound lanes of Interstate 495 (I-495); and a portion of the onramp connecting Route 110 (Macy Street) to I-495 Southbound. These and other properties surrounding the Site are shown in a Site plan in Fig. 2.

Although property uses vary within the Site, there are no buildings within the Site. As described above, the Site only includes undeveloped wetlands, mudflats, and portions of the main channel of the Powwow River. There are electric transmission lines with easements within the Site, including on most of the properties on the western bank of the Powwow River; and there are sewer lines with easements within the Site at 1 Field Street.

1.3. Previous MCP Activities

A comprehensive summary of previous MCP activities was provided in GEI's Phase II CSA and Phase III Remedial Action Plan (RAP) Report (Phase II/III Report) dated July 2009, Class C-2 Response Action Outcome (RAO) Statement dated July 2010, Supplemental Phase II CSA Report dated October 2025, and previous Post-RAO and Phase IV status reports. Contaminants related, in part, to the historical use of the Site as a former MGP have affected soil, groundwater, and other media at the Site. GEI, on behalf of National Grid, has evaluated contaminant conditions at the Site since 2004.

The 5-year RAO deadline for the Site was July 29, 2010. National Grid was unable to achieve a Permanent Solution within that timeframe. Consequently, on July 29, 2010, on behalf of National Grid, GEI submitted a Class C-2 RAO Statement to achieve a Temporary Solution in the short-term, documenting a finding of No Substantial Hazard at the Site and allowing time to continue with the Phase IV remedial design process.

On October 18, 2016, GEI submitted a Phase III RAP Addendum and Phase IV Remedy Implementation Plan (RIP) on behalf of National Grid. Construction associated with planned Phase IV remediation activities within the original Site boundary began in October 2016 and was completed in June 2017 (except for post-construction wetland restoration monitoring). Field activities for the implementation of the Phase IV RIP included excavating wetland soil and a small portion of upland soil to a depth of approximately 3 feet, dredging sediment at the edge of the Powwow River to a depth of approximately 1 foot, transporting the soil and sediment off site for treatment or disposal, and restoring the wetlands.

These activities were documented in the Phase IV Status Report, Post-Temporary Solution Status Report, and Remedial Monitoring Report submitted in August 2017.

In April 2017, during construction associated with Phase IV activities, previously unknown coal tar-impacted soil was discovered while installing coir logs on the southeastern boundary of the work area (Fig. 2). This area was beyond the designed and permitted limit of work. Additional assessment of this area was performed, and these activities are summarized in Section 2.1.

As documented in Phase IV Status Report No. 5, submitted in July 2019, a condition representing Readily Apparent Harm (RAH) exists due to the visible presence of tar over an area greater than 1,000 square feet in sediment within 1 foot of the sediment surface. The condition was observed beyond the limits of the originally defined disposal Site boundary and the original Phase IV remedial area. This condition represents Readily Apparent Harm (310 CMR 0995(3)(b)(1)(c)) and a Substantial Hazard (310 CMR 40.0956(2)(b)). This condition invalidated the Temporary Solution recorded for the Site, and the Temporary Solution was retracted as part of Phase IV Status Report No. 5.

In the Supplemental Phase II CSA Report (2025), GEI expanded the Site based on observations of MGP impacts within the wetland, mudflats, and Powwow River channel beyond the limits of the original Site boundary. Contaminants were detected in sediment 1) in the wetlands and mudflats adjacent to the former MGP near Oakland Street where the release(s) historically occurred; 2) within the Powwow River both upstream and downstream of the mudflats; 3) and within a portion of the former Powwow River channel that was subsequently filled as part of construction of I-495. GEI and National Grid are evaluating potential remedial action alternatives to address contaminants in sediment within the Powwow River.

2. Operation, Maintenance, and Monitoring [310 CMR 40.0877(4)]

This section summarizes the OMM activities performed at the Site.

2.1. Type and Frequency of OMM Activities [310 CMR 40.0877(4)(a)]

Additional assessment was performed to evaluate coal tar impacts beyond the southeastern Site boundary.

2.1.1. Assessment Performed During Previous Reporting Periods

Between April 2017 and July 2025, GEI performed investigations at the Site on behalf of National Grid to delineate the extent of MGP impacts within the wetlands, mudflats, and Powwow River channel beyond the limits of the original Site boundary; evaluate whether various migration pathways existed and could contribute to movement of contaminants; evaluate potential human health and ecological risks; and support future remediation permitting and design. A summary of these investigations is available in the Supplemental Phase II CSA Report submitted to MassDEP on November 3, 2025 and Phase IV Status Report No. 18 submitted to MassDEP on January 28, 2026. Figures 2 and 3 show the locations of test pits, sediment cores and surface water samples associated with those investigations.

2.1.2. Assessment Performed During Current Reporting Period

No assessment was performed during this reporting period.

2.1.3. Remediation Waste Management

Remediation waste was not generated or transported during this reporting period.

2.2. Significant Modifications of the OMM Program [310 CMR 40.0877(4)(b)]

There were no significant modifications made to the OMM program during the current reporting period.

2.3. Evaluation of Performance of Remedial Action [310 CMR 40.0877(4)(c)]

The initial implementation of the Comprehensive Remedial Action indicates that the remedy within the limits of the original Phase IV area is performing as designed to achieve the remedial goals of the Phase IV RIP. However, residual coal tar was observed in the wetland, Powwow River mudflats, and within the main Powwow River channel beyond the southeastern limits of the original Phase IV remedial area. Additional assessment of tar impacts is complete, and results were presented in the Supplemental Phase II CSA Report in November 2025.

A Phase III RAP Addendum and Phase IV RIP Addendum will be submitted now that assessment activities are complete. The Phase III RAP Addendum is anticipated to be submitted before Winter 2026. The specific timeframe for Phase IV remedial activities is uncertain at this time and depends on coordinating property access, evaluating remedial action alternatives for the remainder of the disposal site, and permitting the selected remedial action. Activity and Use Limitations (AULs) may be recorded on the deeds of select properties or portions of properties within the disposal site prior to achieving a Permanent Solution. Recently, an AUL was recorded for a portion of the property at 34-40 Water Street that is within the site boundary.

2.4. Conditions or Problems Affecting Remedial Action Performance [310 CMR 40.0877(4)(d)]

There have not been any conditions or problems noted during the reporting period that are or may be affecting the remedial action performance within the limits of the original Phase IV remedial area.

2.5. Measures Taken to Correct Conditions Affecting Remedial Action Performance [310 CMR 40.0877(4)(e)]

No measures have been necessary to correct conditions affecting the remedial action performance within the limits of the original Phase IV remedial area.

2.6. Name, License Number, Signature, and Seal of LSP [310 CMR 40.0877(4)(f)]

The Licensed Site Professional (LSP) for the Site is James R. Ash, P.E., LSP (LSP License No. 6581). The signature and seal of the LSP are provided on MassDEP transmittal form BWSC108 (Appendix A).

3. Standard Limitations and Disclaimer

This report was prepared exclusively for the use of National Grid. The findings and conclusions, if any, provided by GEI in this report, are based solely on the information reported to GEI as of the date of this report. Future investigations or additional information not provided to GEI at the time of this report may result in modification of this report. GEI's scope of work did not include verifying the completeness or accuracy of information provided by others. Accordingly, GEI shall not be liable for any damages, costs, or other consequences resulting from reliance on such information if it is later determined to be inaccurate or incomplete. GEI's professional services for this project have been performed in a manner consistent with that degree of skill and care ordinarily exercised by members of the same profession currently practicing in the same locality, performing similar services under similar conditions. GEI makes no other representations and no warranties, express or implied.

4. References

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GEI (2026). "Phase IV Status Report No. 18, Amesbury Former MGP, Amesbury, Massachusetts, RTN 3-24070," January 28.

Figures

Figure 1. Site Location Map

Figure 2. River Sampling Locations

Figure 3. Wetland and Mudflat Sampling Locations



0 1000 2000 4000 6000
SCALE, FEET

This Image is from U.S.G.S. Topographic 7.5 Minute Series
Newburyport West, MA-NH Quadrangle, 2021.
Datum is North American Vertical Datum of 1988 (NAVD88).
Contour Interval is 10 Feet.



Phase IV Status Report No. 19
Amesbury Former MGP
Amesbury, Massachusetts

Boston Gas Company d/b/a National Grid
Waltham, Massachusetts

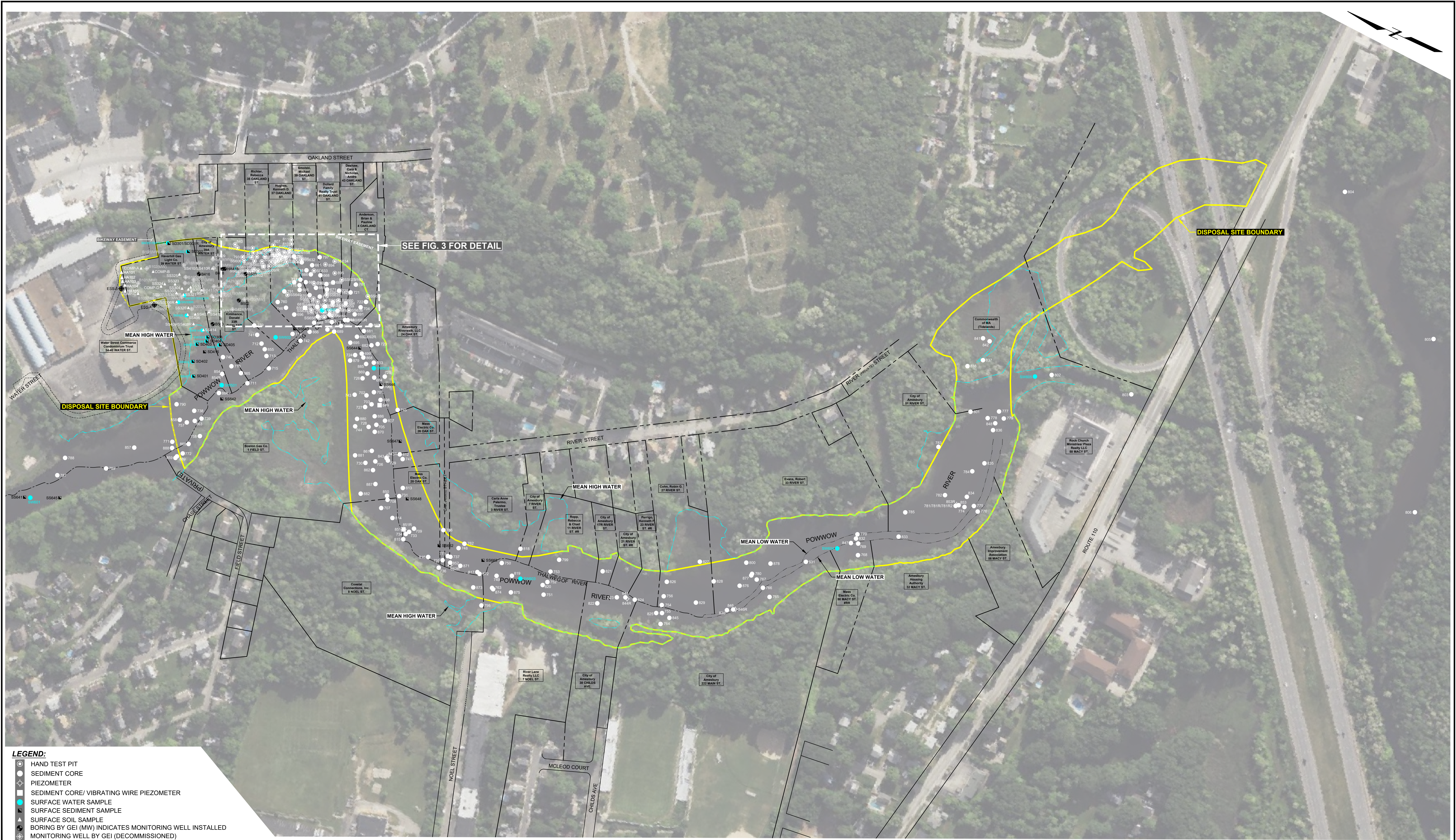


Project 1804576

SITE LOCATION MAP

July 2026

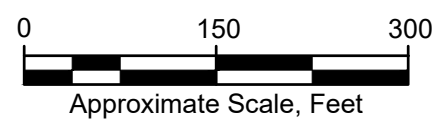
Fig. 1



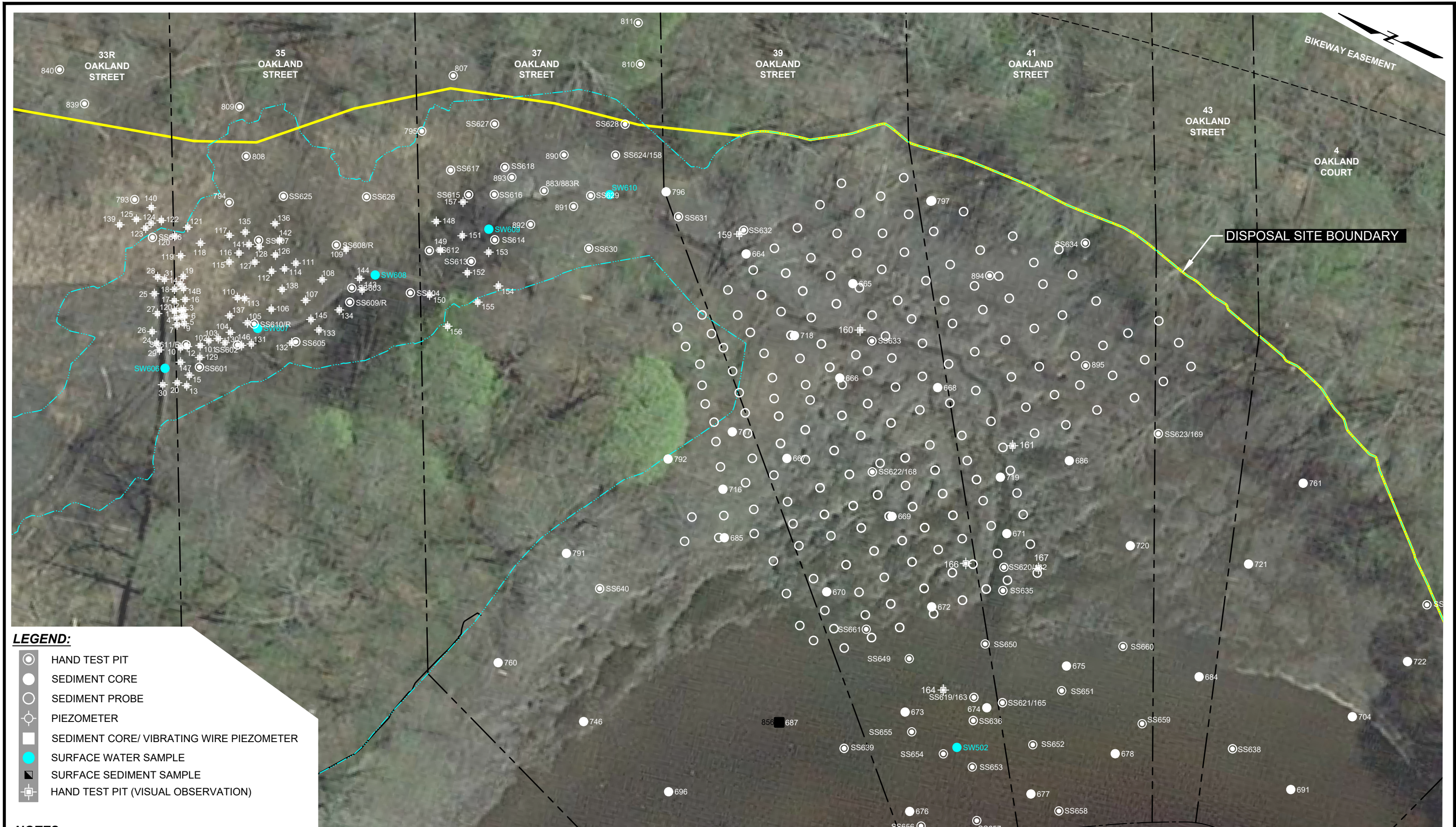
LEGEND:

- HAND TEST PIT
- SEDIMENT CORE
- ⊕ PIEZOMETER
- SEDIMENT CORE/ VIBRATING WIRE PIEZOMETER
- SURFACE WATER SAMPLE
- ▲ SURFACE SEDIMENT SAMPLE
- ▲ SURFACE SOIL SAMPLE
- ⊕ BORING BY GEI (MW) INDICATES MONITORING WELL INSTALLED
- ⊕ MONITORING WELL BY GEI (DECOMMISSIONED)
- ⊕ MONITORING WELL BY OTHERS

- NOTES:**
1. MICROSOFT BING IMAGE 2021.
 2. PARCEL BOUNDARIES, THALWEG OF RIVER, AND MEAN HIGH WATER LINE PROVIDED BY HAYNER/SWANSON, INC., 2025.
 3. SEDIMENT CORE AND PIEZOMETER LOCATIONS ARE GPS-LOCATED. HAND TEST PIT, SURFACE SAMPLE, AND SEDIMENT SAMPLE LOCATIONS ARE APPROXIMATE.



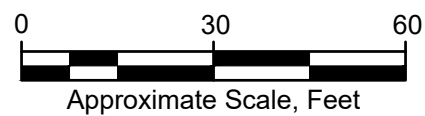
Phase IV Status Report No. 19 Amesbury Former MGP Amesbury, Massachusetts Boston Gas Company d/b/a National Grid Waltham, Massachusetts	 Project 1804576	RIVER SAMPLING LOCATIONS July 2026	Fig. 2



LEGEND:

- HAND TEST PIT
- SEDIMENT CORE
- SEDIMENT PROBE
- ⊕ PIEZOMETER
- SEDIMENT CORE/ VIBRATING WIRE PIEZOMETER
- SURFACE WATER SAMPLE
- SURFACE SEDIMENT SAMPLE
- ⊕ HAND TEST PIT (VISUAL OBSERVATION)

- NOTES:**
- GOOGLE EARTH IMAGE DATED 5/04/2018.
 - HAND TEST PIT, SURFACE SAMPLE, AND SEDIMENT SAMPLE LOCATIONS ARE APPROXIMATE.
 - PARCEL BOUNDARIES, THALWEG OF RIVER AND MEAN HIGH WATER LINE BY HAYNER/SWANSON, 2025.



Phase IV Status Report No. 19 Amesbury Former MGP Site Amesbury, Massachusetts			WETLAND AND MUDFLAT SAMPLING LOCATIONS	
Boston Gas Company d b a National Grid Waltham, Massachusetts			Project 1804576	July 2026

Fig. 3

MassDEP RTN 3-24070
Phase IV Status Report No. 19
Amesbury Former MGP Site,
Amesbury, Massachusetts
July 23, 2026

Appendix A MassDEP Transmittal Form



**COMPREHENSIVE RESPONSE ACTION TRANSMITTAL
FORM & PHASE I COMPLETION STATEMENT**

Pursuant to 310 CMR 40.0484 (Subpart D) and 40.0800 (Subpart H)

Release Tracking Number

3

- 24070

A. SITE LOCATION:

1. Site Name: KEYSPAN PROPERTY MAP 54 PARCEL 219

2. Street Address: WATER ST

3. City/Town: AMESBURY 4. ZIP Code: 019130000

☒ 5. Check here if the disposal site that is the source of the release is Tier Classified. Check the current Tier Classification Category:

☐ a. Tier I ☐ b. Tier ID ☒ c. Tier II

B. THIS FORM IS BEING USED TO: (check all that apply)

- ☐ 1. Submit a **Phase I Completion Statement**, pursuant to 310 CMR 40.0484.
- ☐ 2. Submit a **Revised Phase I Completion Statement**, pursuant to 310 CMR 40.0484.
- ☐ 3. Submit a **Phase II Scope of Work**, pursuant to 310 CMR 40.0834.
- ☐ 4. Submit an **interim Phase II Report**. This report does not satisfy the response action deadline requirements in 310 CMR 40.0500.
- ☐ 5. Submit a **final Phase II Report and Completion Statement**, pursuant to 310 CMR 40.0836.
- ☐ 6. Submit a **Revised Phase II Report and Completion Statement**, pursuant to 310 CMR 40.0836.
- ☐ 7. Submit a **Phase III Remedial Action Plan and Completion Statement**, pursuant to 310 CMR 40.0862.
- ☐ 8. Submit a **Revised Phase III Remedial Action Plan and Completion Statement**, pursuant to 310 CMR 40.0862.
- ☐ 9. Submit a **Phase IV Remedy Implementation Plan**, pursuant to 310 CMR 40.0874.
- ☐ 10. Submit a **Modified Phase IV Remedy Implementation Plan**, pursuant to 310 CMR 40.0874.
- ☐ 11. Submit an **As-Built Construction Report**, pursuant to 310 CMR 40.0875.
- ☒ 12. Submit a **Phase IV Status Report**, pursuant to 310 CMR 40.0877.
- ☐ 13. Submit a **Phase IV Completion Statement**, pursuant to 310 CMR 40.0878 and 40.0879.

Specify the outcome of Phase IV activities: (check one)

- ☐ a. Phase V Operation, Maintenance or Monitoring of the Comprehensive Remedial Action is necessary to achieve a Permanent or Temporary Solution.
- ☐ b. The requirements of a Permanent Solution have been met. A completed Permanent Solution Statement and Report (BWSC104) will be submitted to DEP.
- ☐ c. The requirements of a Temporary Solution have been met. A completed Temporary Solution Statement and Report (BWSC104) will be submitted to DEP.



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B. THIS FORM IS BEING USED TO (cont.): (check all that apply)

- ☐ 14. Submit a **Revised Phase IV Completion Statement**, pursuant to 310 CMR 40.0878 and 40.0879.
- ☐ 15. Submit a **Phase V Status Report**, pursuant to 310 CMR 40.0892.
- ☐ 16. Submit a **Remedial Monitoring Report**. (This report can only be submitted through eDEP.)
- a. Type of Report: (check one) ☐ i. Initial Report ☐ ii. Interim Report ☐ iii. Final Report
- b. Frequency of Submittal: (check all that apply)
- ☐ i. A Remedial Monitoring Report(s) submitted monthly to address an Imminent Hazard.
- ☐ ii. A Remedial Monitoring Report(s) submitted monthly to address a Condition of Substantial Release Migration.
- ☐ iii. A Remedial Monitoring Report(s) submitted every six months, concurrent with a Status Report.
- ☐ iv. A Remedial Monitoring Report(s) submitted, concurrent with a Status Report.
- c. Status of Site: (check one) ☐ i. Phase IV ☐ ii. Phase V ☐ iii. Remedy Operation Status ☐ iv. Temporary Solution
- d. Number of Remedial Systems and/or Monitoring Programs: _____
- A separate BWSC108A, CRA Remedial Monitoring Report, must be filled out for each Remedial System and/or Monitoring Program addressed by this transmittal form.
- ☐ 17. Submit a **Remedy Operation Status**, pursuant to 310 CMR 40.0893.
- ☐ 18. Submit a **Status Report to maintain a Remedy Operation Status**, pursuant to 310 CMR 40.0893(2).
- ☐ 19. Submit a **Transfer and/or a Modification of Persons Maintaining a Remedy Operation Status (ROS)**, pursuant to 310 CMR 40.0893(5) (check one, or both, if applicable).
- ☐ a. Submit a Transfer of Persons Maintaining an ROS (the transferee should be the person listed in Section D, "Person Undertaking Response Actions").
- ☐ b. Submit a Modification of Persons Maintaining an ROS (the primary representative should be the person listed in Section D, "Person Undertaking Response Actions").
- c. Number of Persons Maintaining an ROS not including the primary representative: _____
- ☐ 20. Submit a **Termination of a Remedy Operation Status**, pursuant to 310 CMR 40.0893(6).(check one)
- ☐ a. Submit a notice indicating ROS performance standards have not been met. A plan and timetable pursuant to 310 CMR 40.0893(6)(b) for resuming the ROS are attached.
- ☐ b. Submit a notice of Termination of ROS.
- ☐ 21. Submit a **Phase V Completion Statement**, pursuant to 310 CMR 40.0894.
- Specify the outcome of Phase V activities: (check one)
- ☐ a. The requirements of a Permanent Solution have been met. A completed Permanent Solution Statement and Report (BWSC104) will be submitted to DEP.
- ☐ b. The requirements for a Temporary Solution have been met. A completed Temporary Solution Statement and Report (BWSC104) will be submitted to DEP.
- ☐ 22. Submit a **Revised Phase V Completion Statement**, pursuant to 310 CMR 40.0894.
- ☐ 23. Submit a **Temporary Solution Status Report**, pursuant to 310 CMR 40.0898.
- ☐ 24. Submit a **Plan for the Application of Remedial Additives** near a sensitive receptor, pursuant to 310 CMR 40.0046(3).
- a. Status of Site: (check one)
- ☐ i. Phase IV ☐ ii. Phase V ☐ iii. Remedy Operation Status ☐ iv. Temporary Solution



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C. LSP SIGNATURE AND STAMP:

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and 309 CMR 4.03(2), and (iii) the provisions of 309 CMR 4.03(3), to the best of my knowledge, information and belief,

> if Section B indicates that a **Phase I, Phase II, Phase III, Phase IV or Phase V Completion Statement** and/or a **Termination of a Remedy Operation Status** is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B indicates that a **Phase II Scope of Work** or a **Phase IV Remedy Implementation Plan** is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B indicates that an **As-Built Construction Report**, a **Remedy Operation Status**, a **Phase IV, Phase V or Temporary Solution Status Report**, a **Status Report to Maintain a Remedy Operation Status**, a **Transfer or Modification of Persons Maintaining a Remedy Operation Status** and/or a **Remedial Monitoring Report** is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal.

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

1. LSP#: 6581

2. First Name: JAMES R

3. Last Name: ASH

4. Telephone: 7817214018

5. Ext.:

6. Email: jash@geiconsultants.com

7. Signature: JAMES R ASH

8. Date: 7/26/2026
(mm/dd/yyyy)

9. LSP Stamp:





Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC 108

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D. PERSON UNDERTAKING RESPONSE ACTIONS:

1. Check all that apply: ☐ a. change in contact name ☐ b. change of address ☒ c. change in the person undertaking response actions
2. Name of Organization: BOSTON GAS COMPANY
3. Contact First Name: AARON 4. Last Name: TOWNSLEY
5. Street: 170 DATA DRIVE 6. Title: MANAGER NE SITE INV & REM
7. City/Town: WALTHAM 8. State: MA 9. ZIP Code: 024512222
10. Telephone: 7819063985 11. Ext: 12. Email: aaron.townsley@nationalgrid.com

E. RELATIONSHIP TO SITE OF PERSON UNDERTAKING RESPONSE ACTIONS: ☐ Check here to change relationship

- ☒ 1. RP or PRP ☐ a. Owner ☐ b. Operator ☐ c. Generator ☐ d. Transporter
- ☒ e. Other RP or PRP Specify: NON-SPECIFIED PRP
- ☐ 2. Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)
- ☐ 3. Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))
- ☐ 4. Any Other Person Undertaking Response Actions Specify Relationship:

F. REQUIRED ATTACHMENT AND SUBMITTALS:

- ☐ 1. Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.
- ☐ 2. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the submittal of any Phase Reports to DEP.
- ☐ 3. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the availability of a Phase III Remedial Action Plan.
- ☐ 4. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the availability of a Phase IV Remedy Implementation Plan.
- ☐ 5. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of any field work involving the implementation of a Phase IV Remedial Action.
- ☐ 6. If submitting a Transfer of a Remedy Operation Status (as per 310 CMR 40.0893(5)), check here to certify that a statement detailing the compliance history for the person making this submittal (transferee) is attached.
- ☐ 7. If submitting a Modification of a Remedy Operation Status (as per 310 CMR 40.0893(5)), check here to certify that a statement detailing the compliance history for each new person making this submittal is attached.
- ☐ 8. Check here if any non-updatable information provided on this form is incorrect, e.g. Release Address/Location Aid. Send corrections to: BWSC.eDEP@Mass.Gov.
- ☒ 9. Check here to certify that the LSP Opinion containing the material facts, data including, but not limited to: pressure measurements, maps, graphs, or diagrams, and other information is attached.



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G. CERTIFICATION OF PERSON UNDERTAKING RESPONSE ACTIONS:

1. I, AARON TOWNSLEY, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

>if Section B indicates that this is a **Modification of a Remedy Operation Status (ROS)**, I attest under the pains and penalties of perjury that I am fully authorized to act on behalf of all persons performing response actions under the ROS as stated in 310 CMR 40.0893(5)(d) to receive oral and written correspondence from MassDEP with respect to performance of response actions under the ROS, and to receive a statement of fee amount as per 4.03(3).

I understand that any material received by the Primary Representative from MassDEP shall be deemed received by all the persons performing response actions under the ROS, and I am aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate or incomplete information.

2. By: AARON TOWNSLEY 3. Title: MANAGER NE SITE INV & REM
Signature

4. For: BOSTON GAS COMPANY 5. Date: 7/24/2026
(Name of person or entity recorded in Section D) (mm/dd/yyyy)

☐ 6. Check here if the address of the person providing certification is different from address recorded in Section D.

7. Street: _____

8. City/Town: _____ 9. State: _____ 10. ZIP Code: _____

11. Telephone: _____ 12. Ext.: _____ 13. Email: _____

YOU ARE SUBJECT TO AN ANNUAL COMPLIANCE ASSURANCE FEE OF UP TO \$10,000 PER BILLABLE YEAR FOR THIS DISPOSAL SITE. YOU MUST LEGIBLY COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.

Date Stamp (DEP USE ONLY:)

