

April 2025 Massachusetts Contingency Plan (MCP) Report

MCP Phase II Comprehensive Site Assessment
Report submitted to MassDEP on April 21, 2025

Summarizes results of recent site investigation
activities:

**28 new soil borings for collection and analysis of
soil samples**

- 16 locations on Industrial Parcel
- 12 location in PERA-3

9 new monitoring installations – all on PERA-3

**Groundwater sampling October 2023, November
2024 and February 2025**

- Monitoring wells on Industrial Parcel and
PERA-3



MCP Phase II Report Highlights

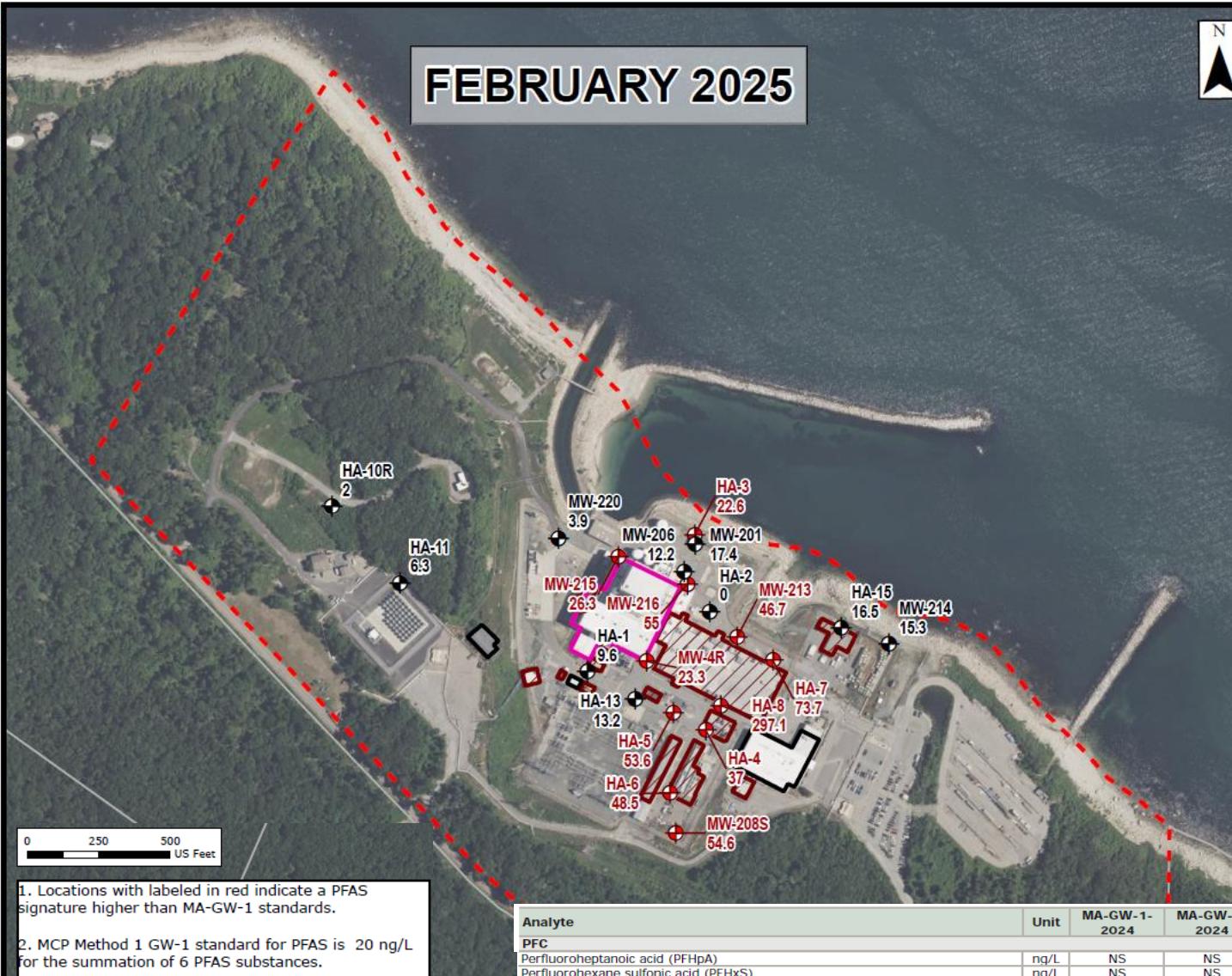
1. Eight (8) underground storage tanks (USTs) have been removed from the Industrial Parcel; no soil impacts during removal of tanks:

Tank	Number of USTs	Capacity (gallons)	Removal Date
Butler Building Fuel Oil UST	1	1,000	July 7, 2022
Technical Support Diesel Tank UST	1	3,000	July 12, 2022
Station Blackout Emergency Diesel Generator Fuel Tanks T-160 A&B USTs	2	20,000	July 13-14, 2022
Emergency Diesel Generator Fuel Tanks T-126 A&B USTs	2	25,000	July 21-22, 2022
Station Heating System Fuel Oil Tanks T-219 A&B USTs	2	25,000	July 16, 2024

2. Per- and Polyfluoroalkyl Substances (PFAS) detected in groundwater

- No history of using aqueous fire fighting foams
- No PFAS detections in soil that identify a “point source”
- At Industrial Parcel, variability in the individual PFAS compounds, indicating most likely source is leaching from various materials in numerous products at the site
- At PERA-3, PFAS only at one monitoring well
- Quarterly groundwater monitoring (both Industrial Parcel and PERA-3)

PFAS in Groundwater – Industrial Parcel



MCP Phase II Report Highlights - continued

3. Other constituents in groundwater are isolated to one monitoring well location, or have not been consistently detected over time:

- Benzo(a)pyrene, arsenic, vanadium, cadmium and lead
- Quarterly groundwater monitoring

4. Polychlorinated biphenyls detected in three of six soil piles in PERA-3.

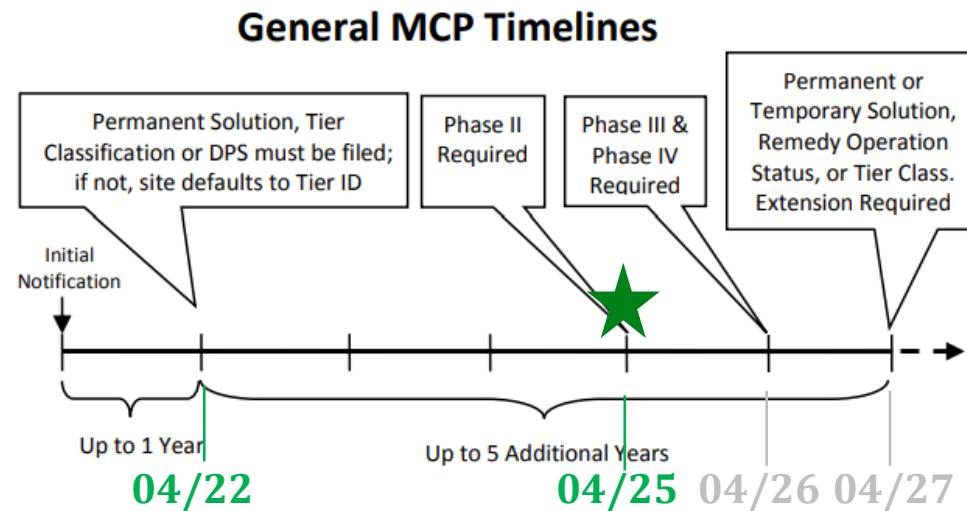
- The origin of the soil piles is unknown dumping
- HDI is planning to remove the soil piles in 2025 following EPA Toxic Substance Control Act (TSCA) and MCP reporting requirements

5. MCP Interim Risk Characterizations:

- Interim, in that current conditions do not reflect the “end state” of the property.
- Risk characterization will be re-performed after all demolition activities have been complete, access for additional characterization completed, and final site restoration activities underway.

MCP Deadlines and the Settlement Agreement

MCP includes deadlines for completing comprehensive response activities:



Forthcoming MCP Reports:

4/2026: Phase III Remedial Action Alternatives
Phase IV Implementation of Remedial Alternative
Temporary Solution Statement

4/2027: Temporary Solution Statement

2020 Settlement Agreement includes provisions for Site Restoration and Environmental Requirements:

- MCP Permanent Solution Statement at time of Partial Site Release
- Based on current decommissioning schedule, Partial Site Release in 2035
- 2025-2035: continued site characterization and risk characterization as decommissioning progresses
- 2035 Permanent Solution Statement (consistent with Settlement Agreement and MCP)