

DRAFT
FINDING OF SUITABILITY TO TRANSFER
NATICK SOLDIER SYSTEMS CENTER – WAYLAND HOUSING AREA
OXBOW ROAD AND LAUNCHER WAY
WAYLAND, MASSACHUSETTS

US Army, Natick Soldier Systems Center
10 General Greene Avenue
Natick Massachusetts 01760

January , 2020

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Abbreviations and Acronyms

ACM	Asbestos-containing Materials
AMSD	ASTM Approximate Minimum Search Distance
AR	U.S. Army Regulation
AST	Aboveground Storage Tank
ASTM	American Society for Testing and Materials
CFR	Code of Federal Regulations
CERCLA	Comprehensive Environmental Response Compensation and Liability Act
DoD	Department of Defense
EA	Environmental Assessment
ECOP	Environmental Condition of Property
ECP	Environmental Condition of Property
EPP	Environmental Protection Provision
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
FONSI	Finding of No Significant Impact
FOST	Finding of Suitability to Transfer
LRA	Limited Removal Action
Mass DEP	Massachusetts Department of Environmental Protection
NLEB	Northern Long-Eared Bat
NSSC	U.S. Army Natick Soldier Systems Center
pCi/L	picocuries per liter
PCBs	Polychlorinated Biphenyls
SSDS	Subsurface Sewage Disposal System
US	United States
USACE	United States Army Corps of Engineers
USACE-NAE	United States Army Corps of Engineers New England District
USFWS	United States Fish and Wildlife Service
UST	Underground Storage Tank
UXO	Unexploded Ordnance

1.0 Purpose

The U.S. Army Natick Soldier Systems Center (NSSC) is the owner in fee of the 5.6-acre Wayland Housing Area property (hereafter referred to as the “Property”), a remotely located family housing situated 8 miles north of the NSSC installation, along Oxbow Road and Launcher Way in the town of Wayland, Middlesex County, Massachusetts. NSSC plans to excess and dispose of the Property and sell it to a non-governmental party.

The purpose of this Finding of Suitability to Transfer (FOST) is to document the environmental suitability of an approximately 5.6-acre Wayland Housing Area parcel for transfer and sale (excessing and disposal), consistent with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 120(h) and Department of Defense policy. In addition, the FOST includes the Access Provisions, and other Deed Provisions, and the Environmental Protection Provisions (EPPs) necessary to protect human health or the environment after such transfer.

2.0 Property Description

The Wayland Housing Area Property occupies 5.6 acres along Oxbow Road and Launcher Way, in the town of Wayland, Middlesex County, Massachusetts. The Property is a military housing area, so its primary structures are the 12 wood-frame, one-story, single family houses. Each housing unit has an attached garage and detached wood-frame storage shed. Other structures on the Property include a common use area (playground, gazebo and storage shed) and a bus stop shelter. The remainder of the Property consists of a paved asphalt roadway, paved asphalt driveways serving each housing unit, landscaped areas, utilities, and a forested buffer separating the Property from the adjoining land parcel on three sides.

The Property was acquired by the U.S. government in 1957 as part of the U.S. Army’s former Boston Defense Area, Nike Battery B-73 Project. Nike Battery B-73 anti-aircraft missile defense facilities were constructed in the Wayland area during the mid-1950’s and the Property was purchased to provide local housing to personnel assigned to the Nike facilities. The Property was reassigned to the U.S. Army Natick Laboratory (now the Natick Soldier Systems Center) in September 1970. The Wayland Housing Area served Battery B-73 personnel from the time of its construction in 1958 until the deactivation of the Nike Battery facilities in 1974. The Property continued to serve as a military family housing area after Battery B-73 was deactivated and has provided off-site housing for local military personnel, including personnel assigned to the Natick Laboratory/Natick Soldier Systems Center from 1974 through the fall of 2018. The last of the housing units at the Wayland Housing Area are expected to be vacated by around 30 November 2018 in anticipation of the pending sale (USACE, 2019). A site location map and aerial site plan are provided attached, as Enclosure 1.

3.0 Environmental Documentation

A determination of the environmental condition of the Property was made based on the 2019 Environmental Condition of Property (ECP) report (USACE, 2019). The ECP report was prepared in accordance with US Army Regulation 200-1, Section 15-5 c(6) (Environmental Protection and Enhancement) and consistent with the requirements of American Society for Testing and Materials (ASTM) Designation D6008-96 (Standard Practice for Conducting Environmental Baseline Surveys; ASTM, 2014). The information provided in the ECP is a result of a search of federal, tribal and local agency files within the prescribed ASTM D6008-96 approximate minimum search distances (AMSD).

A more detailed list of documents providing information on environmental conditions of the Property is attached (Enclosure 2).

4.0 Environmental Condition of Property

Based on the findings of the ECP report and in accordance with ASTM designation D5746-98 (2016), the Department of Defense Standard Classification of Environmental Condition of Property (ECOP) category for the Property is as follows:

- ECOP Category Type 4; US Army Natick Soldier Systems Center Wayland Housing Area Property, Wayland, Massachusetts, 5.6-acre parcel.

A summary of the ECOP category definition for the Property is provided in Enclosure 3.

4.1 Environmental Remediation Sites

There are no formal environmental remediation sites on the Property. As described in detail in the ECP report (USACE, 2019) and summarized in Section 4.3.1 below, No. 2 fuel oil soil contamination was observed at one location on-site, associated with possible release from a No. 2 fuel oil underground storage tanks (UST) located at one of the housing units. This site is described below and also referred to in attached Enclosure 4.

In October 2004, petroleum related soil contamination in excess of applicable Massachusetts Department of Environmental Protection (Mass DEP) cleanup standards was detected in soil samples collected from the grave of a USTs removed at 92 Oxbow Road. A Limited Removal Action (LRA), performed in accordance with Mass DEP requirements, was undertaken at this location. The LRA consisted of the excavation of petroleum contaminated soil in the bottom and sidewalls of the former UST grave, soil screening, soil sampling, and soil disposal. Approximately 10 cubic yards of soil was removed and transported to a local asphalt batching plant for recycling. With the appropriate implementation of the LRA in accordance with Mass DEP requirements, this incident was considered closed from a regulatory perspective.

4.2 Storage, Release, or Disposal of Hazardous Substances

There is no evidence that hazardous substances were stored, released, or disposed of on the Property in excess of the 40 Code of Federal Regulations Part 373 reportable quantities. As described in more detail in Section 4.3.1, petroleum products (specifically No. 2 fuel oil) were stored on the Property for more than one year (in underground storage tanks serving the housing units) and a release did occur at one location that required implementation of a soil removal action. The CERCLA notice and covenant information (provided in association with the petroleum product release and soil removal action), along with CERCLA access provision and other deed provisions, as provided as Enclosure 5, will be included in the deed, as will the Environmental Protection Provisions (EPPs) as provided as Enclosure 6.

4.3 Petroleum and Petroleum Products

4.3.1 Underground/Aboveground Storage Tanks

- **Current Underground Storage Tank (UST)/Aboveground Storage Tank (AST) Sites** - There are no petroleum bulk storage or other USTs or ASTs on the Property.
- **Former UST/AST Sites** – A 275-gallon single wall steel No. 2 fuel oil UST was installed at each of the Property's 12 housing units when constructed in 1958. These original USTs were removed in June 1989 and were replaced with new 550-gallon double-walled steel USTs. Records associated with the 1989 UST replacements indicated no evidence of significant oil releases or

reportable soil contamination. No soil removal or other remedial activities were undertaken in association with the 1989 tank replacements.

All 12 USTs at the Property were removed in December 2003 (Nobis, 2004a). During the 2003 UST removal, soil contamination levels exceeding the Massachusetts Department of Environmental Protection (Mass DEP) DEP MCP RCS-1 Category soil cleanup standard was noted in the tank grave 92 Oxbow Road. A Limited Removal Action (LRA), performed in accordance with Mass DEP requirements, was undertaken at this location (Nobis, 2004b). The LRA consisted of the excavation of petroleum contaminated soil in the bottom and sidewalls of the former UST grave, soil screening, soil sampling, and soil disposal. Approximately 10 cubic yards of soil was removed and transported to a local asphalt batching plant for recycling. Details regarding the UST removal and supporting documentation are provided in the main body and Appendix H of the ECP report (USACE, 2019).

A summary of the UST/AST petroleum product activities is provided as Enclosure 4 (Notification of Petroleum Products Storage, Release, or Disposal).

4.3.2 Non-UST/AST Storage, Release, or Disposal of Petroleum Products

There is no evidence that non-UST/AST petroleum products in excess of 55 gallons were stored on the Property for 1 year or more.

4.4 Asbestos Containing Materials (ACM)

As described in detail in the ECP report (USACE, 2019), asbestos containing materials (ACM) have been identified in accessible areas in all of the housing units. The ACM identified during asbestos surveys conducted in 2011 and 2012 (provided in Appendix I of the ECP report) consisted primarily of joint compound associated with drywall construction, floor tiles, and floor tile mastic. The ACM were found to be in good condition (i.e., intact and undamaged) in all housing units. Certain inaccessible areas, such as areas within walls and enclosed chases, above ceiling fixtures, operating machinery and electrical equipment, foundations, inside mechanical equipment, and roofs, were not evaluated. The asbestos inspection contractor recommended that “destructive ACM surveys should be performed prior to any proposed renovations or maintenance involving inaccessible areas”.

At the request of the Army, additional follow-up asbestos re-inspection surveys were performed at each of the 12 housing units in mid-September of 2019. The results of the re-inspection closely resembled those of the 2011/2012 inspections for the areas inspected in 2011/2012. The 2019 inspection program included testing of roofing shingles and exterior black side paper, neither of which were tested during the 2011/2012 program. ACM was detected in roofing shingles at 3 Launcher Way, but was not detected at any of the other housing units. No asbestos was detected in black side paper at any of the housing units. . A description of the 2019 re-inspection program and associated inspection report documentation are provided in a technical memorandum addendum to the 2019 USACE ECP report (USACE, 2020)

ACM identified during the surveys should be properly maintained. In acknowledgement of the limitations of the initial surveys, prospective buyers should be notified of the presence of ACM on the Property and informed of the potential need for additional testing (including testing of inaccessible areas not previously tested) and abatement prior to undertaking building renovations, maintenance or demolition (USACE, 2019). A notice of the presence of asbestos, provided in the EPPs (Enclosure 6), will be included in the deed.

4.5 Lead Paint

As described in detail in the ECP report (USACE, 2019), lead paint surveys were performed in all 12 housing units in January and February 2002. Deleading activities were undertaken in the 2005 to 2008 timeframe to bring the housing facilities in to compliance with applicable Massachusetts lead poisoning prevention and control regulations. Certification of lead paint compliance by means of a lead paint inspector “letter of full deleading compliance” is available for all 12 housing units.

At the request of the Army, additional follow-up lead paint re-inspection surveys were performed at each of the 12 housing units in August and September of 2019. That survey determined that 2 of the 12 units (1 Luncher Way and 100 Oxbow Road) continued to be in full compliance with applicable Massachusetts lead poisoning prevention and control regulations and a “certification of maintained compliance” (an addendum to the “letter of full deleading compliance” noted in the previous paragraph) is available for each of these units. The 2019 inspection determined that the remaining 10 of the 12 units are no longer in full compliance. Conditions resulting in non-compliance were primarily in exterior areas and mainly associated with loose, cracked paint in previously covered (by vinyl covering) or encapsulated painted areas. A description of the 2019 re-inspection program and associated inspection report documentation are provided in a technical memorandum addendum to the 2019 USACE ECP report (USACE, 2020).

Prospective buyers should be notified of the presence of lead based paint on the Property and informed of the potential need for additional testing and abatement prior to undertaking building renovations, maintenance or demolition (USACE, 2019). A notice of the presence of lead paint, provided in the EPPs (Enclosure 6), will be included in the deed.

4.6 Polychlorinated Biphenyls

There is no evidence that equipment containing polychlorinated biphenyls (PCBs) is located on the Property. Based on the observed nature of the lighting present in the housing units, it is unlikely that PCB lighting ballast are present inside the homes. Eversource is responsible for managing the overhead electric utilities along East Militia Heights Road. As noted in the ECP report (USACE, 2019), Eversource’s website indicates that it has implemented a comprehensive PCB removal program and “*has removed or replaced PCB transformers in or near schools, hospitals, multi-family homes, apartment buildings and other high-occupancy buildings and have committed to systematically removing PCB-containing equipment on a structured schedule over time*”. It is not known whether any of the pole-mounted transformers along Oxbow Road and Launcher Way are PCB transformers, however, these transformers are owned and maintained by the utility and are not considered assets of the future sale transaction (USACE, 2019).

4.7 Munitions and Explosives of Concern

There is no reported history of use of munitions and/or explosives of concern on the Property (USACE, 2019).

4.8 Herbicide, Insecticide, Fungicide, and Rodenticide Use

Registered pesticides have been applied to the Property and may continue to be present. NSSC has indicated that they know of no use of any registered pesticide in a manner (1) inconsistent with its labeling or with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)(7 U.S.C. § 136, et seq.) and other applicable laws and regulations, or (2) not in accordance with its intended purpose (USACE, 2019). Prospective buyers should be notified of the use of pesticides on the Property and informed of the potential that future actions, including demolition of structures or any disturbance or removal of soil, may result in

exposure to exposure to or cause a release or threatened release of such pesticide. Prospective buyers should be informed of their responsibility and liability associated with such potential exposures or releases of pesticides. The deed will contain the Pesticide Notice and Covenant included in the Environmental Protection Provisions (Enclosure 6).

4.9 Radon

As described in detail in the ECP report (USACE, 2019), radon testing was conducted at the Property's housing units in the 1989-1990 timeframe. Radon was not detected above the USEPA's 4 pCi/L action limit in any of the housing units tested. Based on the findings of the radon survey, it was determined that radon mitigation systems were not required at the Wayland Housing Area and none were installed.

4.10 Waste Disposal and On-Site Dumping

No visible evidence of on-site waste disposal or dumping was evident during the site inspection in support of the ECP report or in historical aerial photographs of the Property (USACE, 2019).

4.11 Subsurface Sewage Disposal Systems

As described in detail in the ECP report (USACE, 2019), sanitary sewage from the housing units at Wayland Housing Area is managed via use of on-site subsurface sewage disposal systems (SSDS). The septic systems serving the housing area were installed in the 1990's and have the required Certification of Compliance from the Wayland Board of Health, confirming that the systems are "substantially in compliance with the terms of the Permit, Title 5 of the [Mass DEP], and the Regulations of the Town of Wayland Board of Health". Copies of the compliance certifications are available in Appendix G of the ECP report (USACE, 2019). Pumping records indicate that the septic tanks have been pumped out regularly, typically every 1 to 2 years.

Mass DEP "Title 5" on-site sewage treatment and disposal system regulations (310 CMR 15.00) require that in association with the sale of a property in which the prospective buyer plans to continue use of the system, septic systems are to be inspected within 2 years before a sale, or if weather conditions prevent inspection at the time of a sale, the inspection must take place within 6 months afterward. In these traditional sales, the selling property owner is responsible for ensuring that such an inspection is performed within the required timeframe. However, NSSC plans to sell the Property as one land parcel and not 12 separate housing parcels and does not anticipate that the perspective buyer will plan to implement residential occupancy of the individual units. Therefore, NSSC does not anticipate performing Title 5 inspections prior to the sale of the Property. USACE recommends that the prospective buyer be informed of the requirements for Title 5 inspection/certification should they choose at a future time to implement individual occupancy of the current units.

4.12 Other Property Conditions

There are no other hazardous conditions on the property that present an unacceptable risk to human health and the environment.

5.0 Adjacent Property Conditions

There are no conditions adjacent to the Property that present an unacceptable risk to human health and the environment.

6.0 Environmental Remediation Agreements

There are no environmental remediation orders or agreements applicable to the Property being transferred. The deed will include a provision reserving the Army's right to conduct remediation activities if necessary in the future (Enclosure 5).

7.0 Natural and Biological Resources

No surface water bodies or wetlands are present on the Property or in the immediate surrounding area (USACE 2019). Although not specifically identified as being present or having habitat at the Property, the northern long-eared bat (*Myotis septentrionalis*) (NLEB) is considered a federally-listed threatened species throughout the state of Massachusetts. The U.S. Fish and Wildlife Service (USFWS) issued an interim 4(d) rule which prohibits incidental take (an action that is not intended to take a species but may still result in incidental harmful effects on the species) with some limited exceptions provided the activities protect known maternity roosts and hibernacula (USFWS, 2015).

The planned disposal of the Property will not involve tree removal, prescribed burns, or other actions with potential to disturb NLEB habitat; therefore, formal consultation with USFWS relative to the NLEB is not required prior to the sale. The prospective buyers of the Property are hereby notified of the potential presence of the NLEB in Massachusetts and the associated potential need for future consultation with USFWS if tree removal, prescribed burns, or other actions with potential to disturb NLEB habitat are planned.

8.0 Regulatory/Public Coordination

The U.S. Environmental Protection Agency Region I, the Massachusetts Department of Environmental Protection, and the public will be notified of the initiation of this FOST and this draft version of the FOST will be made available for public review. Regulatory/public comments received during the public comment period will be reviewed and incorporated, as appropriate, into a signed final version of this FOST. A copy of the regulatory/public comments and the Army response will be included as Enclosures 7 and 8, respectively.

9.0 National Environmental Policy Act Compliance

The environmental impacts associated with the proposed transfer of the Property have been analyzed in accordance with the National Environmental Policy Act (NEPA). The results of the Environmental Assessment (EA) and an associated Finding of No Significant Impact (FONSI) are documented in the report titled, Environmental Assessment and Finding of No Significant Impact for Army Family Housing Sale, Wayland Housing Area, U.S. Army Natick Soldier Systems Center, Natick, Massachusetts, October 2019. Public notice of the availability of this draft EA/FONSI document was published on October 17, 2019 and included a 30-day public comment period running through November 17, 2019. Regulatory/public comments received during the public comment period will be reviewed and incorporated, as appropriate, into a signed final version of the EA/FONSI document. The date of the signed FONSI will be noted herein. (December 18, 2019). No encumbrances or conditions were identified in the NEPA analysis as necessary to protect human health or the environment.

10.0 Finding of Suitability to Transfer

Based on the information above, I conclude that all removal or remedial actions necessary to protect human health and the environment have been taken and the Property is transferable under CERCLA Section 120(h)(3). In addition, all Department of Defense requirements to reach a finding of a suitability to transfer have been met, subject to the terms and conditions in the attached Environmental Protection Provisions (EPPs) that shall be included in the deed of the property. The deed will also include the CERCLA Section 120(h)(3) Notice, Covenant, Access Provisions and Other Deed Provisions.

MI
DAVIS D. TINDOLL, JR., SES
DIRECTOR< IMCOM-SUSTAINMENT

Date:

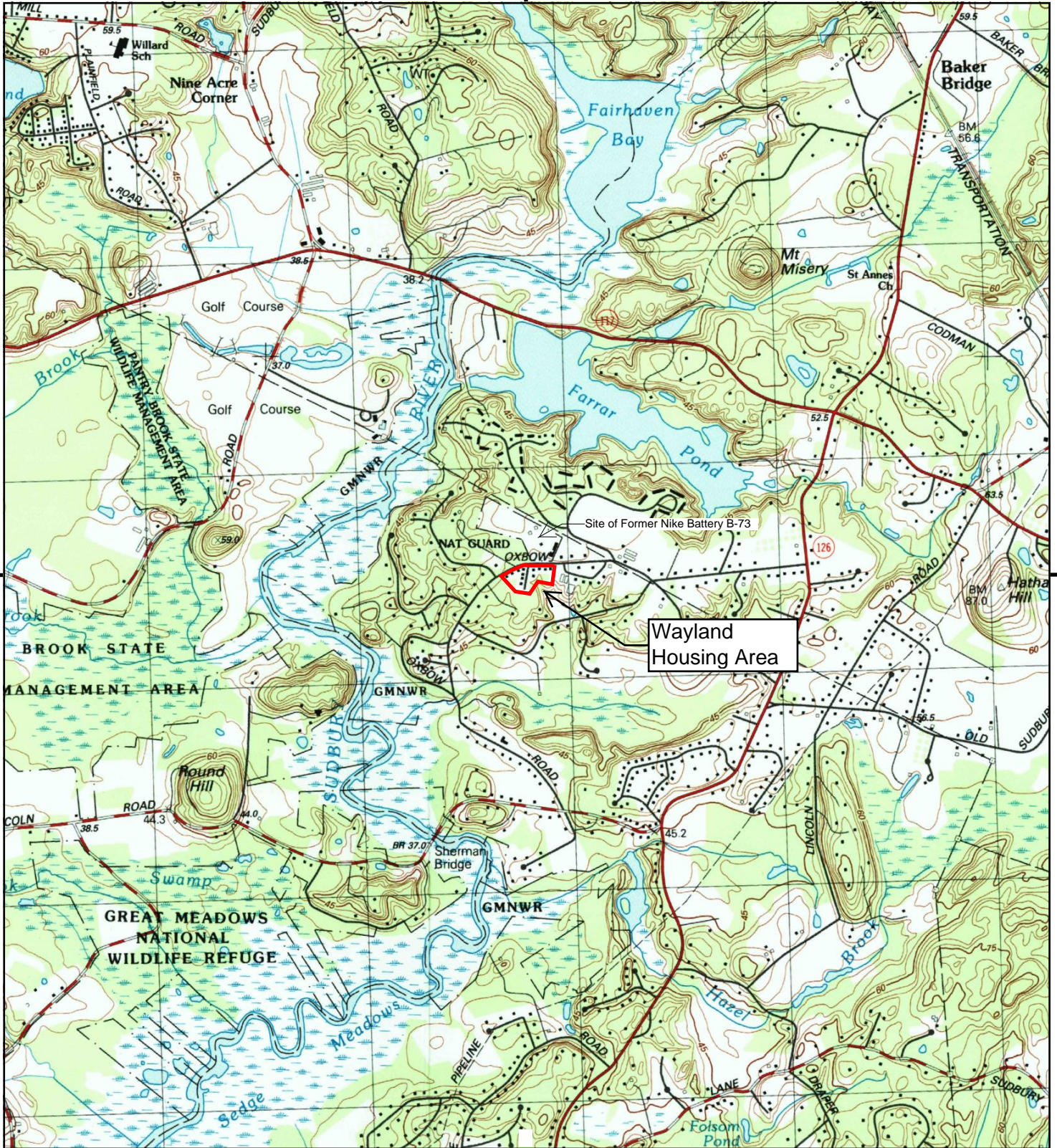
Enclosures:

- Enclosure 1 – Site Location Map and Aerial Site Plan
- Enclosure 2 – Environmental Documentation
- Enclosure 3 – Description of Property - Environmental Condition of Property
- Enclosure 4 – Notification of Petroleum Product Storage, Release, or Disposal
- Enclosure 5 – CERCLA Notice, Covenant, and Access Provisions and Other Deed Provisions
- Enclosure 6 – Environmental Protection Provisions
- Enclosure 7 – Regulatory/Public Comments
- Enclosure 8 – Army Response

11.0 References

- ASTM, 2016. ASTM Standard D5746-98, Standard Classification of Environmental Condition of Property Area Types for Defense Base Closure and Realignment Facilities, reapproved 2016.
- ASTM, 2014. American Society for Testing and Materials (ASTM) Standard D6008-96, Standard Practice for Conducting Environmental Baseline Surveys, reapproved 2014.
- Nobis Engineering, Inc. (Nobis), 2004a. Wayland Underground Storage Tank (UST) Removals Closure Report, Wayland, Massachusetts, February 2004.
- Nobis Engineering, Inc. (Nobis), 2004b. Limited Removal Action Report – Residential Property – 92 Oxbow Road, Wayland, Massachusetts, April 2004.
- U.S. Army Corps of Engineers (USACE). Environmental Condition of Property Report, Natick Soldier Systems Center – Wayland Housing Area, Oxbow Road and Launcher Way, Wayland, Massachusetts. Prepared by Engineering Division, U.S. Army Corps of Engineers. May 2019.
- U.S. Fish and Wildlife Service (USFWS), 2015. Endangered and Threatened Wildlife and Plants; Threatened Species Status for the Northern Long-Eared Bat With 4(d) Rule; Final Rule and Interim Rule. Federal Register 50 CFR Part 17/Vol. 80, No. 63 /Thursday, April 2, 2015 /Rules and Regulations.

Enclosure 1 – Site Location Map and Aerial Site Plan



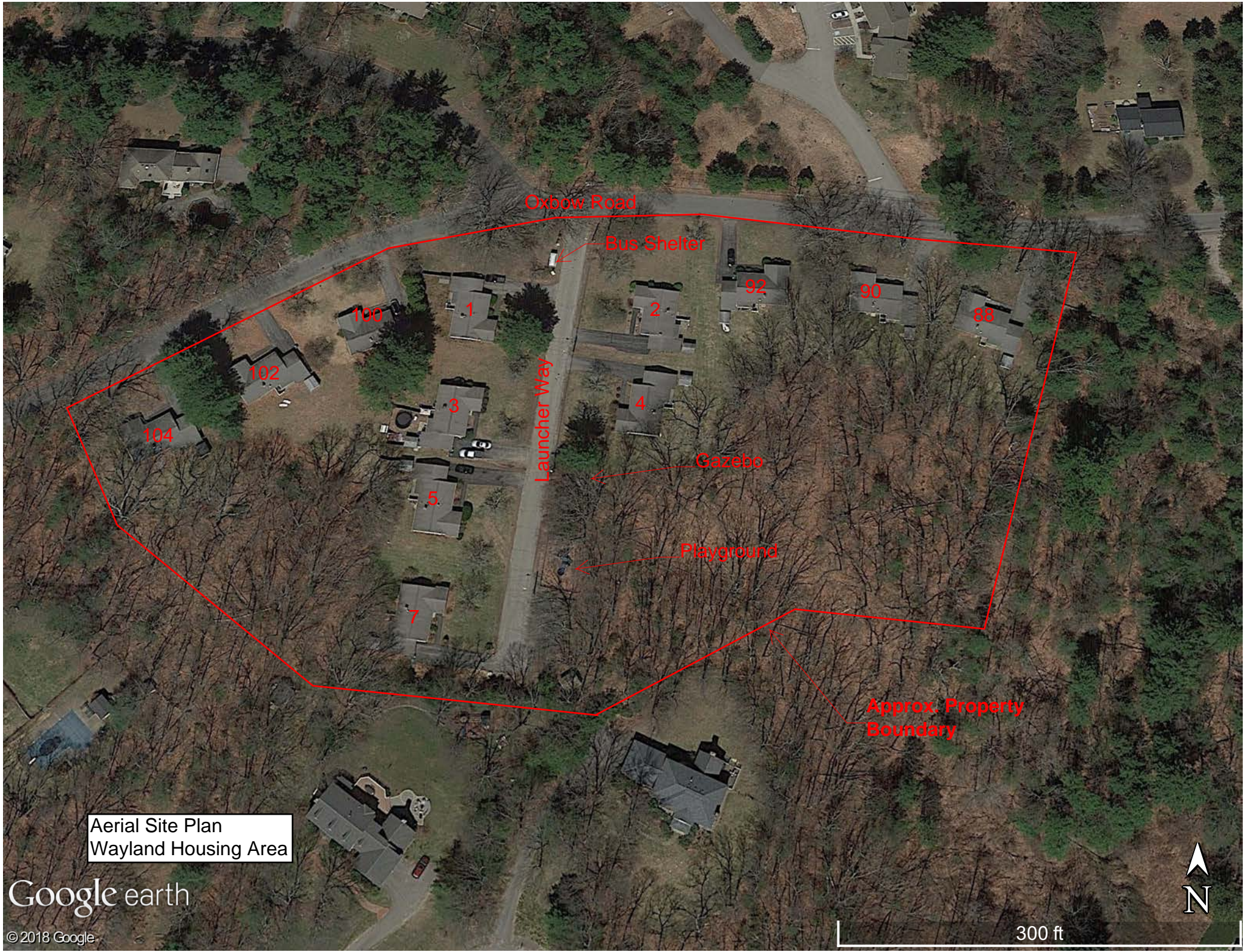
This report includes information from the following map sheet(s).



TP, Maynard, 1987, 7.5-minute

SITE NAME: NSSC Wayland Housing Area
 ADDRESS: Oxbow Road and Launcher Way
 Wayland, MA 01778
 CLIENT: US Army Corps of Engineers, NAE





Aerial Site Plan
Wayland Housing Area

Google earth

© 2018 Google

Approx. Property
Boundary



300 ft

Enclosure 2 – Environmental Documentation

Environmental Documentation

Primary Documentation

U.S. Army Corps of Engineers (USACE). 2019. Environmental Condition of Property Report – Natick Soldier Systems Center, Wayland Housing Area, Oxbow Road and Launcher Way, Wayland, Massachusetts. Prepared by US Army Corps of Engineers New England District, Nov, 2019.

Supplemental Documentation

EDR, 2018a. EDR Historical Topo Map Report; NSSC Wayland Housing Area. August 27, 2018.

EDR, 2018b. The EDR Aerial Photo Decade Package; NSSC Wayland Housing Area. August 27, 2018.

EDR, 2018c. The EDR Radius Map Report with GeoCheck; NSSC Wayland Housing Area. August 27, 2018.

EDR, 2018d. The Environmental Data Resources, Inc. (EDR) City Directory Image Report; NSSC Wayland Housing Area. August 27, 2018.

Eversource, 2018. Eversource: PCB Removal:

<https://www.eversource.com/content/ct-c/about/community/supporting-the-community/environment/pcb-removal> ; accessed November 7, 2018.

Harvard Environmental Services (HES), 2005-2008. Letters of Full Deleading Compliance, 1, 2, 3, 4, 5, and 7 Launcher Way and 88, 90, 92, 100, 102 and 104 Oxbow Road, Wayland, MA, prepared for U.S. Army Soldier Systems Center, Natick, MA, prepared by Harvard Environmental Services, various dates in 2005 through 2008.

Harvard Environmental Services (HES), 2002. Lead Paint Inspection Reports, 1, 2, 3, 4, 5, and 7 Launcher Way and 88, 90, 92, 100, 102 and 104 Oxbow Road, Wayland, MA, prepared for U.S. Army Soldier Systems Center, Natick, MA, prepared by Harvard Environmental Services, various dates in January and February 2002.

Mabbett & Associates Inc. (Mabbett), 2012a. Volume I, Chapter 1, Asbestos Survey Executive Summary Report, prepared for U.S. Army Soldier Systems Center, Natick, MA, prepared by Mabbett & Associates Inc., March 23, 2012.

Mabbett & Associates Inc. (Mabbett), 2012b. Volume I, Chapter 2, Asbestos Management Plan, prepared for U.S. Army Soldier Systems Center, Natick, MA, prepared by Mabbett & Associates Inc., March 23, 2012.

Mabbett & Associates Inc. (Mabbett), 2012a. Volume III, Chapter 1, Asbestos Containing Material Survey Report, 1, 2, 3, 4, 5, and 7 Launcher Way and 88, 90, 92, 100, 102 and 104 Oxbow Road, prepared for U.S. Army Soldier Systems Center, Natick, MA, prepared by Mabbett & Associates Inc., March 23, 2012.

Nobis Engineering, Inc. (Nobis), 2004a. Wayland Underground Storage Tank (UST) Removals Closure Report, Wayland, Massachusetts, February 2004.

Nobis Engineering, Inc. (Nobis), 2004b. Limited Removal Action Report – Residential Property – 92 Oxbow Road, Wayland, Massachusetts, April 2004.

Tech/Ops Landauer, Inc., 1990. Radon Monitoring Reports, 1, 2, 3, 4, 5, and 7 Launcher Way and 88, 90, 92, 100, 102 and 104 Oxbow Road, prepared for U.S. Army Natick RD&E Center, Natick, MA, prepared by Tech/Ops Landauer, Inc., February 1991.

Enclosure 3 – Description of Property – Environmental Condition of Property

Description of Property – Environmental Condition of Property

Description of Property:

US Army Natick Soldier Systems Center Wayland Housing Area Property, Oxbow Road and Launcher Way, Wayland, Massachusetts, entire 5.6-acre parcel.

ECOP Condition Category:

ECOP Category Type 4

Basis of Categorization / Remedial Actions:

As described in ECP report (USACE, 2019), petroleum related soil contamination was observed in 2004 near the former No. 2 fuel oil UST at 92 Oxbow Road. A Limited Removal Action involving the removal /off-site disposal of 10 cubic yards of impacted soil was implemented and the incident was closed from a regulatory perspective. Further remedial action is not anticipated or required.

ECOP Categories:

- Category Type 1 - An area or parcel of real property where no release, or derivatives has occurred (including no migration of these substances from adjacent properties).
- Category Type 2 - An area or parcel of real property where only the release or disposal of petroleum products or their derivatives has occurred.
- Category Type 3 - An area or parcel of real property where release, disposal, or migration, or some combination thereof, of hazardous substances has occurred, but at concentrations that do not require a removal or remedial action.
- **Category Type 4 - An area or parcel of real property where release, disposal, or migration, or some combination thereof, of hazardous substances has occurred, and all remedial actions necessary to protect human health and the environment have been taken.**
- Category Type 5 - An area or parcel of real property where release, disposal, or migration, or some combination thereof, of hazardous substances has occurred and removal or remedial actions, or both, are under way, but all required actions have not yet been taken.
- Category Type 6 - An area or parcel of real property where release, disposal, or migration, or some combination thereof, of hazardous substances has occurred, but required response actions have not yet been initiated.
- Category Type 7 - An area or parcel of real property that is unevaluated or requires additional evaluation.

**Enclosure 4 - Notification of Petroleum Product
Storage, Release, or Disposal**

Notification of Petroleum Product Storage, Release, or Disposal

No. 2 Fuel Oil Underground Storage Tanks Installed in 1958

Address	Removal / Replace Date	Replacement Tank	Comments at Time of Removal
88 Oxbow Road	June 1989	550 gal. double wall steel UST	No release or soil contamination noted
90 Oxbow Road	June 1989	550 gal. double wall steel UST	No release or soil contamination noted
92 Oxbow Road	June 1989	550 gal. double wall steel UST	No release or soil contamination noted
100 Oxbow Road	June 1989	550 gal. double wall steel UST	No release or soil contamination noted
102 Oxbow Road	June 1989	550 gal. double wall steel UST	No release or soil contamination noted
104 Oxbow Road	June 1989	550 gal. double wall steel UST	No release or soil contamination noted
1 Launcher Way	June 1989	550 gal. double wall steel UST	No release or soil contamination noted
2 Launcher Way	June 1989	550 gal. double wall steel UST	No release or soil contamination noted
3 Launcher Way	June 1989	550 gal. double wall steel UST	No release or soil contamination noted
4 Launcher Way	June 1989	300 gal. single wall steel UST	No release or soil contamination noted
5 Launcher Way	June 1989	550 gal. double wall steel UST	No release or soil contamination noted
7 Launcher Way	June 1989	550 gal. double wall steel UST	No release or soil contamination noted
Tanks installed in 1958 were 275-gallon single-walled steel USTs			

No. 2 Fuel Oil Underground Storage Tanks Removed in 2003 (see table above for UST type/cap.)

Address	Removal Date	Comments at Time of Removal
88 Oxbow Road	Dec 2003	No release or soil contamination above Mass DEP cleanup stds. noted (USACE, 2019)
90 Oxbow Road	Dec 2003	No release or soil contamination above Mass DEP cleanup stds. noted (USACE, 2019)
92 Oxbow Road	Dec 2003	Petroleum-related soil contamination above Mass DEP cleanup standards noted. Limited Removal Action implemented. 10 cy of impacted soil removed. Regulatory closure with Mass DEP. No further action required (USACE, 2019; Nobis, 2004a; Nobis, 2004b)
100 Oxbow Road	Dec 2003	No release or soil contamination above Mass DEP cleanup stds. noted (USACE, 2019)
102 Oxbow Road	Dec 2003	No release or soil contamination above Mass DEP cleanup stds. noted (USACE, 2019)
104 Oxbow Road	Dec 2003	No release or soil contamination above Mass DEP cleanup stds. noted (USACE, 2019)
1 Launcher Way	Dec 2003	No release or soil contamination above Mass DEP cleanup stds. noted (USACE, 2019)
2 Launcher Way	Dec 2003	No release or soil contamination above Mass DEP cleanup stds. noted (USACE, 2019)
3 Launcher Way	Dec 2003	No release or soil contamination above Mass DEP cleanup stds. noted (USACE, 2019)
4 Launcher Way	Dec 2003	No release or soil contamination above Mass DEP cleanup stds. noted (USACE, 2019)
5 Launcher Way	Dec 2003	No release or soil contamination above Mass DEP cleanup stds. noted (USACE, 2019)
7 Launcher Way	Dec 2003	No release or soil contamination above Mass DEP cleanup stds. noted (USACE, 2019)
USTs were removed in December 2003 were not replaced as natural gas became available to the housing area.		

Enclosure 5 – CERCLA Notice, Covenant, and Access Provisions and Other Deed Provisions

CERCLA Notice, Covenant, and Access Provisions and Other Deed Provisions

The following CERCLA Notice, Covenant, and Access Provisions, along with the Other Deed Provisions, will be placed in the deed in a substantially similar form to ensure protection of human health and the environment and to preclude any interference with ongoing or completed remediation activities.

I. Property Covered by Notice, Description, Access Rights, and Covenants Made Pursuant to Section 120(h)(3)(A) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9620(h)(3)(A)):

For the Property, the Grantor provides the following notice, description, and covenants and retains the following access rights:

A. Notices Pursuant to Section 120(h)(3)(A)(i)(I) and (II) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9620(h)(3)(A)(i)(I) and (II)):

Pursuant to section 120(h)(3)(A)(i)(I) and (II) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. §9620(h)(3)(A)(i)(I) and (II)) formal notice is not required, as there is no evidence that hazardous substances were stored, released, or disposed of on the Property in excess of the 40 Code of Federal Regulations Part 373 reportable quantities. Petroleum products (specifically No. 2 fuel oil) were stored on the Property for more than one year (in underground storage tanks serving the housing units) and a minor release and soil removal action did occur. Available information regarding the type, quantity, and location of petroleum products and the time at which such products were stored, released, or disposed of, is provided in as Enclosure 4 of the FOST, attached hereto and made a part hereof.

B. Description of Remedial Action Taken, if Any, Pursuant to Section 120(h)(3)(A)(i)(III) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9620(h)(3)(A)(i)(III)):

Pursuant to section 120(h)(3)(A)(i)(III) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. §9620(h)(3)(A)(i)(III)), a description of the remedial action taken, if any, on the Property is provided in the Environmental Condition of Property report (USACE, 2019), attached hereto and made a part hereof.

C. Covenant Pursuant to Section 120(h)(3)(A)(ii) and (B) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9620(h)(3)(A)(ii) and (B))

Pursuant to section 120(h)(3)(A)(ii) and (B) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. §9620(h)(3)(A)(ii) and (B)), the United States warrants that:

1. All remedial action necessary to protect human health and the environment with respect to any hazardous substance identified pursuant to section 120(h)(3)(A)(i)(I) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 remaining on the Property has been taken before the date of this deed, and

2. Any additional remedial action found to be necessary after the date of this deed shall be conducted by the United States.

D. Access Rights Pursuant to Section 120(h)(3)(A)(iii) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. §9620(h)(3)(A)(iii)):

1. The United States retains and reserves a perpetual and assignable easement and right of access on, over, and through the Property, to enter upon the Property in any case in which an environmental response action or corrective action is found to be necessary on the part of the United States, without regard to whether such environmental response action or corrective action is on the Property or on adjoining or nearby lands. Such easement and right of access includes, without limitation, the right to perform any environmental investigation, survey, monitoring, sampling, testing, drilling, boring, coring, test-pitting, installing monitoring or pumping wells or other treatment facilities, response action, corrective action, or any other action necessary for the United States to meet its responsibilities under applicable laws and as provided for in this instrument. Such easement and right of access shall be binding on the Grantee, its successors and assigns, and shall run with the land.

2. In exercising such easement and right of access, the United States shall provide the Grantee or its successors or assigns, as the case may be, with reasonable notice of its intent to enter upon the Property and exercise its rights under this clause, which notice may be severely curtailed or even eliminated in emergency situations. The United States shall use reasonable means to avoid and to minimize interference with the Grantee's and the Grantee's successors' and assigns' quiet enjoyment of the Property. At the completion of work, the work site shall be reasonably restored. Such easement and right of access includes the right to obtain and use utility services, including water, gas, electricity, sewer, and communications services available on the Property at a reasonable charge to the United States. Excluding the reasonable charges for such utility services, no fee, charge, or compensation will be due the Grantee nor its successors and assigns, for the exercise of the easement and right of access hereby retained and reserved by the United States.

3. In exercising such easement and right of access, neither the Grantee nor its successors and assigns, as the case may be, shall have any claim at law or equity against the United States or any officer, employee, agent, contractor of any tier, or servant of the United States based on actions taken by the United States or its officers, employees, agents, contractors of any tier, or servants pursuant to and in accordance with this clause: Provided, however, that nothing in this paragraph shall be considered as a waiver by the Grantee and its successors and assigns of any remedy available to them under the Federal Tort Claims Act.

II. Other Deed Provisions

A. "AS IS"

1. The Grantee acknowledges that it has inspected or has had the opportunity to inspect the Property and accepts the condition and state of repair of the subject Property. The Grantee understands and agrees that the Property and any part thereof is offered "AS IS" without any representation, warranty, or guaranty by the Grantor as to quantity, quality, title, character, condition, size, or kind, or that the same is in condition or fit to be used for the purpose(s) intended by the Grantee, and no claim for allowance or deduction upon such grounds will be considered.

2. No warranties, either express or implied, are given with regard to the condition of the Property, including, without limitation, whether the Property does or does not contain asbestos or lead-based paint. The Grantee shall be deemed to have relied solely on its own judgment in assessing the overall condition of all or any portion of the Property, including, without limitation, any asbestos, lead-based paint, or other conditions on the Property. The failure of the Grantee to inspect or to exercise due diligence to be fully informed as to the condition of all or any portion of the Property offered, will not constitute grounds for any claim or demand against the United States.

3. Nothing in this provision will be construed to modify or negate any of the Grantor's statutory obligations.

B. HOLD HARMLESS

1. To the extent authorized by law, the Grantee, its successors and assigns, covenant and agree to indemnify and hold harmless the Grantor, its officers, agents, and employees from (1) any and all claims, damages, judgments, losses, and costs, including fines and penalties, arising out of the violation of the NOTICES, USE RESTRICTIONS, AND RESTRICTIVE COVENANTS in this deed by the Grantee, its successors and assigns, and (2) any and all any and all claims, damages, and judgments arising out of, or in any manner predicated upon, exposure to asbestos, lead-based paint, or other condition on any portion of the Property after the date of conveyance.

2. The Grantee, its successors and assigns, covenant and agree that the Grantor shall not be responsible for any costs associated with modification or termination of the NOTICES, USE RESTRICTIONS, AND RESTRICTIVE COVENANTS in this deed, including without limitation, any costs associated with additional investigation or remediation of asbestos, lead-based paint, or other condition on any portion of the Property.

3. Nothing in this provision will be construed to modify or negate any of the Grantor's statutory obligations.

C. POST-TRANSFER DISCOVERY OF CONTAMINATION

1. If an actual or threatened release of a hazardous substance is discovered on the Property after the date of conveyance, the Grantee, its successors or assigns, shall be responsible for such release or newly discovered substance unless Grantee is able to demonstrate that such release or such newly discovered substance was due to Grantor's activities, use, or ownership of the Property. If the Grantee, its successors or assigns believe the discovered hazardous substance is attributable to the Grantor's activities, use or ownership of the Property, the Grantee will immediately secure the site and notify the Grantor of the existence of the hazardous substances, and the Grantee will not further disturb such hazardous substances without the written permission of the Grantor.

2. The Grantee, its successors and assigns, as consideration for the conveyance of the Property, agree to release the Grantor from any liability or responsibility for any claims arising solely out of the release of any hazardous substance on the Property occurring after the date of the delivery and acceptance of this deed, where such substance or product was placed on the Property by the Grantee, or its successors, assigns,

D. ENVIRONMENTAL PROTECTION PROVISIONS

The Environmental Protection Provisions are at Enclosure 6, which is attached hereto and made a part hereof. The Grantee shall neither transfer the Property, lease the Property, nor grant any interest, privilege, or license whatsoever in connection with the Property without the inclusion of the Environmental Protection Provisions contained herein, and shall require the inclusion of the Environmental Protection Provisions in all further deeds, easements, transfers, leases, or grant of any interest, privilege, or license.

Enclosure 6 – Environmental Protection Provisions

Environmental Protection Provisions

The following conditions, restrictions, and notifications will be attached, in a substantially similar form, as an exhibit to the deed and be incorporated therein by reference in order to ensure protection of human health and the environment.

1. NOTICE OF THE PRESENCE OF ASBESTOS AND COVENANT

- a. The Grantee is hereby informed and does acknowledge that non-friable asbestos or asbestos-containing material (“ACM”) has been found on the Property. The Property may contain improvements, such as buildings, facilities, equipment, and pipelines, above and below the ground, that contain non-friable asbestos or ACM. The Occupational Safety and Health Administration (OSHA) and the Environmental Protection Agency have determined that such unprotected or unregulated exposure to airborne asbestos fibers increases the risk of asbestos-related diseases, including certain cancers that can result in disability or death.
- b. The Grantee covenants and agrees that its use and occupancy of the Property will be in compliance with all applicable laws relating to asbestos. The Grantee agrees to be responsible for any remediation or abatement of asbestos found to be necessary on the Property to include ACM in or on buried pipelines that may be required under applicable law or regulation.
- c. The Grantee acknowledges that it has inspected or has had the opportunity to inspect the Property as to its asbestos and ACM condition and any hazardous or environmental conditions relating thereto. The Grantee shall be deemed to have relied solely on its own judgment in assessing the overall condition of all or any portion of the Property, including, without limitation, any asbestos or ACM hazards or concerns.

2. NOTICE OF THE PRESENCE OF LEAD-BASED PAINT (LBP) AND COVENANT AGAINST THE USE OF THE PROPERTY FOR RESIDENTIAL PURPOSE

- a. The Grantee is hereby informed and does acknowledge that all buildings on the Property, which were constructed or rehabilitated prior to 1978, are presumed to contain lead-based paint. Lead from paint, paint chips, and dust can pose health hazards if not managed properly. Every purchaser of any interest in Residential Real Property on which a residential dwelling was built prior to 1978 is notified that there is a risk of exposure to lead from lead-based paint that may place young children at risk of developing lead poisoning.
- b. Available information concerning known lead-based paint and/or lead-based paint hazards, the location of lead-based paint and/or lead-based paint hazards, and the condition of painted surfaces is contained in the Environmental Condition of Property (ECP) report (USACE, 2019) and in the Lead Paint Compliance Information provided as provided in Appendix J of said report, and in the January 2020 technical memorandum addendum to said report (USACE 2020). The Grantee has been provided with the federally approved pamphlet on lead poisoning prevention. The Grantee hereby acknowledges receipt of all of the information described in this subparagraph.
- c. The Grantee covenants and agrees that it shall not permit the occupancy or use of any buildings or structures on the Property as Residential Property, as defined under 24 Code of Federal Regulations Part 35, without complying with this section and all applicable federal, state, and local laws and regulations pertaining to lead-based paint and/or lead-based

paint hazards. Prior to permitting the occupancy of the Property where its use subsequent to sale is intended for residential habitation, the Grantee specifically agrees to perform, at its sole expense, the Army's abatement requirements under Title X of the Housing and Community Development Act of 1992 (Residential Lead-Based Paint Hazard Reduction Act of 1992).

- d. The Grantee acknowledges that it has inspected or has had the opportunity to inspect the Property as to its lead-based paint content and condition and any hazardous or environmental conditions relating thereto. The Grantee shall be deemed to have relied solely on its own judgment in assessing the overall condition of all or any portion of the Property, including, without limitation, any lead-based paint hazards or concerns.

3. PESTICIDE NOTICE AND COVENANT

- a. The Grantee is hereby notified and acknowledges that registered pesticides have been applied to the Property conveyed herein and may continue to be present thereon. The Grantee and Grantor know of no use of any registered pesticide in a manner (1) inconsistent with its labeling or with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)(7 U.S.C. § 136, et seq.) and other applicable laws and regulations, or (2) not in accordance with its intended purpose.
- b. The Grantee, for itself, its successors and assigns hereby covenants and agrees that if the Grantee takes any action with regard to the Property, including demolition of structures or any disturbance or removal of soil that may expose, or cause a release of, a threatened release of, or an exposure to, any such pesticide, Grantee assumes all responsibility and liability therefor.

Enclosure 7 – Regulatory/Public Comments

Enclosure 8 – Army Comment Responses



DEPARTMENT OF THE ARMY

US ARMY CORPS OF ENGINEERS
NEW ENGLAND DISTRICT
696 VIRGINIA ROAD
CONCORD MA 01742-2751

USACE-NAE

29 January 2020

MEMORANDUM FOR Record

SUBJECT: Addendum to Environmental Condition of Property Report, Natick Soldier Systems Center – Wayland Housing Area, Oxbow Road and Launcher Way, Wayland, Massachusetts, Prepared by U.S. Army Corps of Engineers New England District, December 2019 – Incorporates Findings of Re-inspections for Asbestos and Lead Paint Conducted in August and September 2019

On the behalf of the U.S. Army Natick Soldier Systems Center (NSSC), the U.S. Army Corps of Engineers New England District (USACE-NAE) prepared an Environmental Condition of Property (ECP) report in support of NSSC's planned sale (excessing and disposal) of its Wayland Housing Area, located along Oxbow Road and Launcher Way in the town of Wayland, Middlesex County, Massachusetts. A final version of the ECP report was certified and approved in December 2019.

The ECP report included an assessment of environmental conditions relative to the presence of asbestos containing materials (ACM) and lead paint in the property's 12 family housing units. The ECP report's asbestos assessment was based on asbestos surveys conducted in the housing units in a 2011/2012 timeframe. The ECP report's lead paint assessment was based on initial lead paint inspections performed in 2002 and subsequent deleading compliance inspections performed in a 2005 through 2008 timeframe.

In August and September of 2019, under contract with NSSC, the firms that performed the original inspections, Mabbett and Associates, Inc. (Mabbett) for asbestos and Harvard Environmental Services (HES) for lead paint, performed re-inspections of the Wayland Housing Area's 12 housing units. This technical memorandum summarizes the findings of these re-inspections and is intended to serve as an addendum to the December 2019 ECP report. The re-inspection documentation for asbestos and lead paint are provided as attachments to this technical memorandum.

Asbestos Re-inspection

The U.S. Army Natick Soldiers System Center (NSSC), Department of Public Works (DPW), Environmental Office (EHO) located in Natick, Massachusetts, contracted with Mabbett & Associates, Inc. (Mabbett) to review and update previous asbestos containing material (ACM) surveys and perform additional bulk sampling services at the government owned Wayland Housing Area. Mabbett first reviewed the previous surveys that they performed in the 2011/2012 timeframe. During the re-inspections, which were conducted on September 18, 2019, any suspect ACM that was not sampled during previous surveys was sampled, collected and analyzed as appropriate. At each of the housing units, bulk samples of black roofing shingles and black side paper (present under exterior vinyl siding) were collected and analyzed, as sampling/analysis of these exterior materials did not take place during the 2011/2012

inspection surveys. Reports indicating findings of the re-inspection surveys are provided in Attachment 1 of this technical memorandum.

A review of the 2019 re-inspection reports indicates that, with a few exceptions, the findings of the recent re-inspections are fully consistent with those reported in the 2011/2012 inspection reports, as summarized in the December 2019 ECP report. The exceptions are that in several units, bulk samples of materials previously not sampled indicated the presence of ACM. The units with new findings include:

- 5 Launcher Way:
 - black residual mastic in bedroom 1 contained 10% chrysotile; this condition is also suspected in Bedroom 3; the ACM is in good condition and covered by a non-asbestos containing material;
 - black floor tile in the utility room and its associated black mastic contained 10% chrysotile; the ACM is in good condition;
 - black mastic in the bathroom contained 8% chrysotile; the ACM is in good condition and covered by a non-asbestos containing material;
- 7 Launcher Way:
 - 12" x 12" beige floor tile in the kitchen contains 5% chrysotile; ACM is in good condition;
- 104 Oxbow Road:
 - 9" x 9" grey floor tile in the utility room contains 8% chrysotile; associated black mastic contains 10% chrysotile; this conditions is also suspected for floor tile and mastic in bedroom 1;

As new information, asbestos was not detected in the black side paper samples collected from any of the 12 housing units. Asbestos was not detected in black roofing shingles in 11 of the 12 housing units. Black roofing shingles at 3 Launcher Way contained 10% chrysotile.

Acknowledging that several additional areas with ACM have been identified, the core statement relative to ACM as noted in Section 7.2.1 of the December 2019 ECP report is unchanged. Prospective buyers should be notified of the presence of ACM on the Property and informed of the potential need for additional testing (including testing of inaccessible areas not previously tested) and abatement prior to undertaking building renovations, maintenance or demolition.

Lead Paint Re-inspection

NSSC contracted with Harvard Environmental Services (HES) to review documentation developed in association with previous lead paint inspections and assess the current status of compliance with applicable Massachusetts regulations for lead poisoning prevention and control.

As noted in the December 2019 ECP report, Letters of Full Deleading Compliance were issued for the 12 Wayland Housing Area housing units in the 2004 to 2008 timeframe. Under the work scope of the 2019 lead paint re-inspection program, HES performed a "Post-Compliance Assessment Determination" (PCAD) for the 12 units. HES first reviewed past inspection, risk assessment, and re-inspection reports

for each housing unit and the corresponding Letter of Full Deleading Compliance. During the re-inspections, which were conducted on August 28 (2-5 Launcher Way), August 29 (88, 92 and 104 Oxbow Road), September 6 (90 Oxbow Road) and September 27, 2019 (1 and 7 Launcher Way, 100 and 102 Oxbow Road), HES performed visual inspections of areas identified in prior inspections, checking all surfaces with remaining leaded paint or other coating, plaster, and putty to ensure that they remain intact, checking all coverings, including encapsulants, to ensure that they remain an effective barrier, and checking all reversed woodwork surfaces to ensure that they remain reversed. Documentation associated with the 2019 lead paint re-inspections is provided in Attachment 2 of this technical memorandum.

HES determined that 2 of the 12 units have maintained compliance with Massachusetts lead paint regulations. For these 2 units (1 Launcher Way and 100 Oxbow Road), HES issued a Certification of Maintained Compliance (COMC). The COMC serves as an addendum to the originally issued Letter of Full Deleading Compliance.

Re-inspection of the remaining 10 units identified deficiencies that resulted in a determination of non-compliance. The interior of the housing units remained in compliance. Conditions resulting in non-compliance occurred in exterior areas of the housing units. Loose, flaking paint was observed at exterior door casings at 7 of the housing units. Loose, flaking paint in exterior upper trim boards was observed at 2 units and for an exterior side beam at 1 unit. Loose paint on chimneys (above the roof line) was observed at 4 units. At several units, the vinyl coverings which previously covered the door casings, trim boards or beams had become loose or damaged. At these exterior locations, in order to return to compliance, the surfaces would have to be restored to an intact condition or be covered.

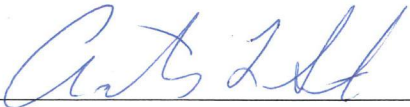
Acknowledging that 10 of the 12 housing units are no longer in compliance, the core statement relative to lead paint as presented in Section 7.2.2 of the December 2019 ECP report is unchanged. Prospective buyers should be notified of the presence of lead based paint on the Property and informed of the potential need for additional testing and abatement prior to undertaking building renovations, maintenance or demolition.

Certification of Addendum to Environmental Condition of Property Report dated December, 2019

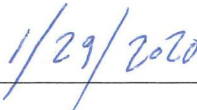
All information/documentation provided in this addendum to the December 2019 Environmental Condition of Property (ECP) report for the Natick Soldier Systems Center – Wayland Housing Area accurately reflects the environmental condition of the Property based on the findings of the 2019 asbestos and lead paint re-inspections described above and in the attachments.

The (preparer) has prepared this addendum to the Environmental Condition of Property (ECP) report as a representative of United States Army Corps of Engineers and on the behalf of the United States Army Natick Soldier Systems Center. This document was prepared in general accordance with the United States Department of Defense (DoD) requirements for completion of an ECP Report. All information/documentation provided accurately reflects the environmental condition of the Property based on the findings of the asbestos and lead paint re-inspections described herein.

Certified by:



ANTHONY L. SILVA, P.E.
Environmental Professional, USACE



Date:

Approved by:

ANDREW H. HENDERSON
LTC, MI
Commanding

Date