

September 23, 2024

Ms. Deborah Burke, Director
Office of Strategic Planning and Community Development
City of Malden
215 Pleasant Street - 3rd Floor
Malden, Massachusetts 02148

RE: Roosevelt Park
Proposed Release Abatement Measures
Malden, Massachusetts 02148

Dear Ms. Burke,

Following the decision by the City to terminate the proposed renovation plans for the field at Roosevelt Park, this office was requested to review the risk posed by the existing Historic Fill conditions across the field and, more specifically, to identify the requirements to achieve a Permanent Solution in accordance with the Massachusetts Contingency Plan (MCP) for the localized condition in the southeast corner of the field where elevated levels of lead were found in shallow soil (0-12 inches) and were reported to the Massachusetts Department of Environmental Protection (MassDEP) during initial project planning. This office has re-evaluated the data and information collected to support the formerly proposed renovation project to determine those steps necessary comply with the requirements of the MCP and whether there is any current risk associated with the continued use of the remainder of the field beyond the area in southeast portions of the field that were fenced in (Figure 1) to restrict access in December of 2019.

As discussed in further detail within this correspondence, while additional measures are necessary to achieve closure under the MCP for the elevated levels of lead in shallow soil within the fenced in area, our evaluation indicates that provided that there is no excavation that could result in exposure to deeper soils below 3 feet, or relocation of soil currently located below 1 foot from surface grade to a shallower depth, there appears to be no current risk associated with the Historic Fill condition across the remainder of the field.

As presented in prior reports pertaining to this project, the analysis of soil across the field in 2019 to enable the evaluation of disposal options for the previously proposed renovation plans revealed the presence of Historic Fill material containing metals and petroleum hydrocarbons beneath shallow surface cover. As documented in the Phase I Site Investigation report, this fill material had likely been placed at the site sometime prior to the mid 1940's to support the use of the area for athletic fields. While the fill material was observed beneath shallow surface cover at each boring location across the field, elevated concentrations of lead were identified within the upper 12-inches of soil at two sampling

locations in southeastern portions of field that required MassDEP notification. To prevent access to this area until the renovation work proposed at that time was completed, the existing fence was placed around the locations exhibiting shallow elevated concentrations of lead in December of 2019.

In December of 2020 a Temporary Solution was filed with MassDEP for the field indicating that a Permanent Solution under the MCP could not be achieved until the shallow soil containing the elevated lead concentrations within the fenced in area was removed and replaced with a new playing surface as part of the proposed renovations at the time. Following the termination of the Project, NCA was asked to evaluate what measures would be necessary to achieve a Permanent Solution for the site pursuant to the requirements in the MCP.

Under the MCP, Historic Fill is regarded as a background condition and does not need to be considered in the evaluation of risk. While this exemption is a regulatory mechanism that was established to address the impracticality of requiring risk reduction measures for common background conditions, it doesn't necessarily mean that there is a condition of No Significant Risk, as that term is defined within the MCP. Given the nature of land use as a public park, notwithstanding the risk exemption described above, this office completed an evaluation of risk across the field utilizing the data and information obtained from the soil disposal characterization program completed for the previously proposed renovations. The data obtained from that evaluation indicated that with the exception of the currently fenced in area in southeast corner of the field where the two samples with elevated levels of lead were identified within twelve inches of existing surface grade, there was no significant long term or short-term risk associated with the Historic Fill across the field with the existing shallow soil cap that is currently in place. This conclusion assumes that there is no excavation at the field that could result in exposure to soil below 3 feet from surface grade or relocation of soil presently below 1 foot to a shallower depth.

As the planned renovations that would have addressed the fenced in area are no longer proposed, NCA has identified those steps that would now need to be completed to restore the area in compliance with the requirements of the MCP to achieve a Permanent Solution. To enable the removal of the fence and restore the former playing surfaces it will be necessary to remove and dispose of the existing vegetation and the upper 1.5 feet of soil, install a geotextile fabric at the bottom of the excavation, restore the area to pre-excavation surface grade elevations with imported fill and new infield and grass surfaces. This activity will need to be completed as a Release Abatement Measure (RAM) under the MCP and it will be necessary to submit either a modified or new Notice of Intent under the applicable state/local Wetlands Protection Act (WPA) regulations to address the change in scope of work from the previously proposed renovation project.

As residents have designated Roosevelt Park as a Public Involvement Plan (PIP) location under the MCP, it will also be necessary to first prepare a draft RAM Plan for public review prior to finalizing the plan and schedule for the completion of the work. The PIP plan that has been developed for this site requires that the following activities be completed prior to finalizing the RAM.

1. Place a copy of the Draft RAM Plan in the Roosevelt Park PIP Information Repository (Malden Public Library) for public review.
2. Provide notice to the individuals on the PIP mailing list regarding the availability of the draft RAM Plan and date of scheduled Public Meeting 14 days prior to the meeting.
3. Publish a Notice in a local paper regarding the proposed meeting to present the draft RAM Plan 14 days prior to the meeting.
4. Provide a 20-day public comment period on the draft RAM plan presented at the meeting.
5. Respond to all comments on the RAM Plan within 30 days of the completion of the public comment period.

We can prepare the draft RAM Plan within the next 30-45 days, following which the PIP activities listed above can be initiated. Upon completion of the PIP process, the WPA submittal can be prepared and once either a modified or new Order of Conditions is issued and any applicable appellate process has concluded, a tentative schedule, cost estimate and detailed public bid documents to implement the RAM Plan can be prepared.

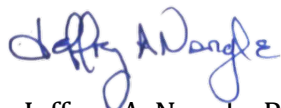
We trust this summary is sufficient for your current needs, however if you should have any questions or require any additional information, please feel free to contact this office at your convenience.

Very truly yours,

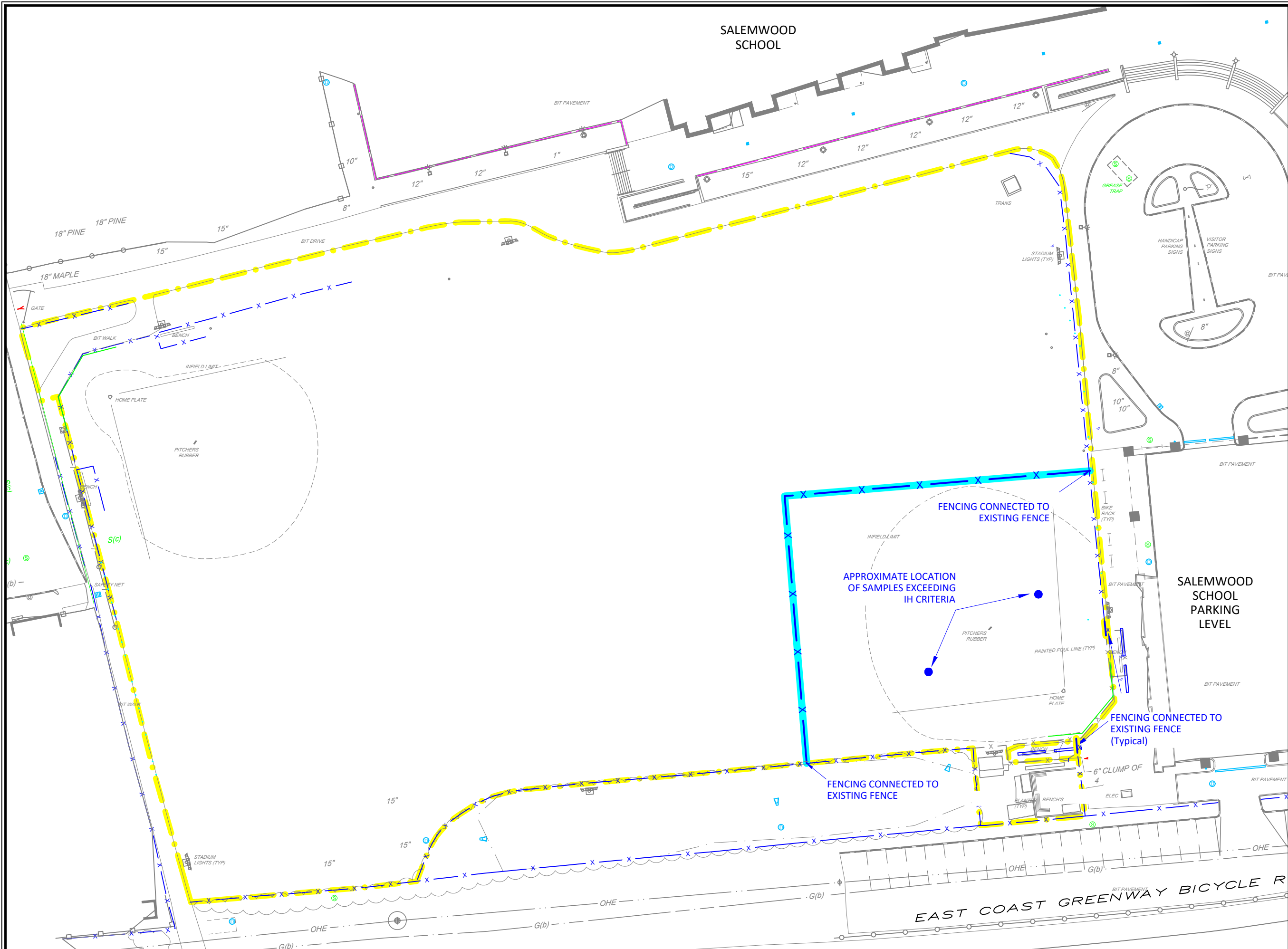
NANGLE CONSULTING ASSOCIATES, INC.



James P. Parker, L.S.P.



Jeffrey A. Nangle, P.E., L.S. P.



REFERENCE: Electronic file: Topographic
Worksheet - Roosevelt Park, prepared by
Hayner/Swanson, August 2019.
Aerial photograph from BING Maps.

**ROOSEVELT PARK MALDEN,
MASSACHUSETTS**

**APPROXIMATE IMMINENT
HAZARD SAMPLE LOCATIONS**

0 40
Approximate Scale In Feet

Date: DEC 2020

Job No: 834.01

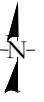


Figure
3