

**REPORT ON
ASTM PHASE I ENVIRONMENTAL SITE ASSESSMENT
615-ACRE PARCEL
HOPKINTON FARMS
HOPKINTON, MASSACHUSETTS**

by

**Haley & Aldrich, Inc.
Boston, Massachusetts**

for

**Mezitt Agricultural Corporation
c/o Rubin & Rudman LLP
Boston, Massachusetts**

**File No. 32079-000
25 April 2005**

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25 April 2005
File No. 32079-000

Mezitt Agricultural Corporation
c/o Rubin & Rudman LLP
50 Rowes Wharf
Boston, Massachusetts 02110

Attention: Ronald N. Stetler, Esq.

Subject: ASTM Phase I Environmental Site Assessment
615 Acres- Hopkinton Farm
Hopkinton, Massachusetts

Ladies and Gentlemen:

This report presents the results of a Phase I Environmental Site Assessment (Phase I) conducted at the above referenced property. This work was performed by Haley & Aldrich, Inc. (Haley & Aldrich) in accordance with our proposal Mezitt Agricultural Corporation dated 3 March 2005 ("Agreement"). As indicated in our proposal, the Phase I portion of this work was conducted using practices consistent with the ASTM E 1527-00 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

The goal of the Phase I assessment was to evaluate site history, existing observable conditions, current site use, and current and former uses of surrounding properties to identify the potential presence of "Recognized Environmental Conditions (RECs)" at the site, as defined in the ASTM E 1527-00 Standard. Our conclusions regarding the presence and potential impact of RECs on the subject site are intended to help the user evaluate the "business environmental risk" associated with the site, as defined in the ASTM E 1527-00 Standard and discussed in the Introduction section of this report.

Thank you for the opportunity to perform these services for you. Please do not hesitate to contact us if you have any questions or comments.

Sincerely yours,
HALEY & ALDRICH, INC.

David T. Montplaisir
Senior Environmental Geologist

Deborah H. Gevalt, P.G., LSP
Senior Vice President

Enclosures
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EXECUTIVE SUMMARY

Haley & Aldrich, Inc., has performed a Phase I Environmental Site Assessment of the Hopkinton Farms property in the Town of Hopkinton and Town of Ashland, Massachusetts. The scope of work is described and conditioned by our proposal dated 3 March 2005. As indicated in our proposal, the Phase I portion of this work was performed in conformance with the scope and limitations of the ASTM E 1527-00 Standard. Exceptions to, or deletions from, this practice are described in Section 1 of this report. Our conclusions are intended to help the user evaluate the “business environmental risk” associated with the site, as defined in the ASTM E 1527-00 Standard and discussed in the Introduction section of this report.

The subject site is comprised of 32 land parcels in the Town of Hopkinton and Town of Ashland totaling approximately 615 acres. For the purpose of this investigation, land areas have been grouped into larger parcels and subsequently identified as Lots A₁, A₂, B, C and D in the prospective land sale exhibit. The land area is currently owned by members of the Mezitt family and Mezitt Agricultural Corporation. According to the Key Site Contact, an additional approximately 15 acres included in Hopkinton Map U12 Block 15 (Lot B), and owned by Carol Dodson Spengler, is also included in the 615-acre land area.

The property consists primarily of agricultural fields, woodland, suspect wetland areas, and irrigation ponds. The land area is bisected by East Main Street in Hopkinton. Other frontage roads include Wilson Street, Clinton Street, Curtis Road, and Frankland Road in Hopkinton, and Olive Street, Howe Street, and Cross Street in the Town of Ashland.

Significant improvements to the site are limited to a residential property identified on Hopkinton Map R14 Block 9 (26 Clinton Street), dormitories leased by the South Middlesex Opportunity Council located on Hopkinton Map R13 Block 8 (44 Wilson Street), and a cellular telephone transmitting tower located on Hopkinton Map R13 Block 9. The transmitting tower is leased to Sprint Spectrum L.P. Additional permanent features include natural gas easements across the site.

Two water extraction wells are located on the south side of Route 135 and are used to supplement irrigation ponds during low water periods.

RECOGNIZED ENVIRONMENTAL CONDITIONS

The goal of the ASTM E 1527-00 Standard practice is to identify Recognized Environmental Conditions (RECs), as defined in the Standard and in Section 1 of this report.

This assessment has not revealed evidence of recognized environmental conditions in connection with the property.

HISTORICAL RECs AND KNOWN OR SUSPECT ENVIRONMENTAL CONDITIONS

The ASTM E 1527-00 Standard also requires that historical RECs (HRECs) and other known or suspect environmental conditions (KECs and SECs, respectively), as defined in the Standard and in Section I of this report, be identified in the Phase I. The standard defines historical RECs as environmental conditions “which in the past would have been considered a recognized environmental condition, but which may or may not be considered a recognized

environmental condition currently.” The term “known or suspect environmental condition” is not specifically defined in the standard, but is used by Haley & Aldrich to highlight environmentally-related information that is not anticipated to adversely affect the subject site and/or does not rise to the level of a REC.

KEC #1: Fuel Oil UST at Former Greenhouse – Curtis Road

A no. 2 fuel oil underground storage tank (UST) was reportedly abandoned adjacent to the greenhouse near a residential structure at 16 Curtis Road. No information on the UST size was identified. However, based on the nature of the site operation, Haley & Aldrich would anticipate a 200 to 1,000 gallon UST to be present. According to the Key Site Contact, the UST was drained and filled with an inert material. No information regarding the closure of the UST, including soil sampling and analysis was available from the site contact or in municipal files. It has not been determined where the UST is located on the lot owned by Mezitt Agricultural Corporation, or the residential building at 16 Curtis Road. No evidence of a UST (i.e., fill pipes or vent pipes) suggesting the UST location was identified during the Haley & Aldrich site visit was identified.

KEC #2: Operation of Farm Dumps

The Key Site Contact indicated that areas of the 615-acre property were historically used as a farm dumping areas. Based on discussions with the Key Site Contacts and site observations, three areas on Lot A₂, were identified as areas where historic disposal of general farm wastes, including empty pesticide/herbicide containers and solid debris occurred. At the time of the site visit, suspect asbestos containing materials (ACM) transite panels were also observed on Lot A₂ (Mezitt Agricultural field designation 20A). These materials were reportedly from former greenhouses on the property. The majority of the panels were intact. However, there was evidence that several panels had been damaged during disposal activities. One disturbed area was also observed in a 1955 aerial photograph of Lot C area, and may have been used as an historical dump area.

SEC #1: Release at Weston Nursery Property

This property is located adjacent to Lot A₂. In 1993, petroleum contamination was noted during the removal of a UST on the property (DEP RTN #2-1102). A Phase IV Remedial Action Plan (RAP) was submitted to DEP on 10 July 2002. This RAP only included a portion of the disposal site, identified as “Area 2”, and described as the former gasoline and diesel fueling station release area. “Area 1”, near the former waste oil UST was not included in the RAP because the necessary steps to clean up “Area 1” was described as being too costly to achieve a permanent solution at that time. Action Environmental, the consultant for the site, noted that the implementation of an AUL would be pursued for “Area 1”. Phase IV actions included the removal of 5,746 cubic yards of contaminated soil. After a series of confirmatory tests, contaminated (above designated background levels) soil was removed to a soil recycling facility while clean (at or below designated background levels) soils were used as backfill at the site. During the excavation, 8,600 gallons of contaminated groundwater were recovered, treated by a dual-canister activated carbon treatment system, and discharged.

A partial Response Action Outcome (RAO) (including “Area 2”, but not “Area 1”) was submitted to DEP on 27 September 2002. This partial Class A-2 RAO included a Risk Characterization that indicated a level of “No Significant Risk” existed on the site. An Activity and Use Limitation was not included as part of this RAO.

In October 2004, the RAO for Area 2 was retracted following review by the DEP, because additional actions were required to determine a condition of no significant risk was present. Specific deficiencies identified by the DEP included the failure to define the horizontal and vertical extent of contamination as well as the failure to evaluate all contaminants of concern.

On 15 April 2005, Environmental Compliance Services (ECS) re-submitted a Class A-2 RAO both Area 1 and Area 2, and addressed deficiencies noted by the DEP. As a part its activities, ECS installed 12 soil boring, with four locations converted to groundwater monitoring wells in Area 2. ECS also collected a sample from the abandoned floor drain in the adjacent garage to assess its potential for a contaminant migration pathway. Two additional soil borings/monitoring wells were installed in Area 1. Contamination detected was largely restricted to petroleum constituents that would be anticipated for waste oil, diesel fuel, and gasoline releases. However, elevated arsenic was detected in the abandoned garage drain. This drain leads to a septic tank, and eventually discharges to a retention basin, which is suspected to be on the subject site. Follow-up sampling at the outfall by ECS did not detect arsenic above method detection limits. Based on the additional data collected, a Method 1/Method 3 (Soil in Area 2 tank grave) Risk Assessment was completed by ECS. All groundwater collected in the ECS evaluation was below the applicable Method 1 standard for GW-2/GW-3.

Based on the recent sampling, and lack of groundwater contaminants above applicable risk assessment standards, it is considered unlikely that the subject site has been impacted by this release. Further, sampling of sediment near the outfall on the subject site did not indicate the presence of metals which were identified in the garage drain. However, in the event that conditions at Weston Nursery (namely the petroleum and waste oil release locations) impacted the subject site, it would likely be eligible for Downgradient Property Status (DPS) which would relieve the property owner from conducting response actions for releases migrating from an off-site groundwater contamination source, provided the property owner complies with the general requirements of 310 CMR 40.0183.

SUMMARY

In summary, two known environmental conditions and one suspect environmental condition were identified during this assessment. Haley & Aldrich recommends the completion of a limited subsurface evaluation near the former UST located on Curtis Street to confirm that a release of oil has not occurred. Further, limited subsurface evaluations appear warranted near the former farm dumping areas in order to assess the nature of the potential fill materials, and evaluate the potential for a release to the environment from these dump areas.

The remainder of this report contains additional information regarding the Phase I work performed, the resulting findings summarized above, and limitations affecting this report.

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1	Project Locus
2	Site Plan

1. INTRODUCTION

1.1 Purpose

This Phase I was performed in conformance with the scope and limitations of the ASTM E 1527-00 Standard. The purpose of this assessment was to evaluate site history, existing observable conditions, current site use, and current and historic uses of surrounding properties to identify the potential presence of Recognized Environmental Conditions (RECs) in connection with the subject site. RECs are defined by ASTM as “the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on a property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include de minimis conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis are not recognized environmental conditions.”

In addition, the Standard requires that historical RECs (HRECs) and known or suspect environmental conditions are identified in the Phase I report. The standard defines historical RECs as environmental conditions “which in the past would have been considered a recognized environmental condition, but which may or may not be considered a recognized environmental condition currently.” The term “known or suspect environmental condition” is not specifically defined in the standard, but is used by Haley & Aldrich to highlight environmentally-related information that is not anticipated to adversely affect the subject site and/or does not rise to the level of an REC.

Our conclusions are intended to help the user evaluate the “business environmental risk” associated with the site, defined by ASTM as “a risk which can have a material environmental or environmentally-driven financial impact on the business associated with the current or planned use of a parcel of commercial real estate. Consideration of business environmental risk issues may involve addressing one or more non-scope considerations.”

1.2 Site Identification

The subject site is comprised of 32 land parcels in the Town of Hopkinton and Town of Ashland totaling approximately 615 acres (refer to Appendix B for a complete listing of parcels included in subject site). For the purpose of this investigation, land areas have been grouped into larger parcels and subsequently identified as Lots A₁, A₂, B, C and D in the prospective land sale exhibit. The land area is currently owned/operated by members of the Mezitt family and Mezitt Agricultural Corporation. According to the Key Site Contact, an additional approximately 15 acres included in Hopkinton Map U12 Block 15 (Lot B), and owned by Carol Dodson Spengler, is also included in the 615-acre land area.

The property consists primarily of agricultural fields, woodland, suspect wetland areas, and irrigation ponds. Two wells are located south side of Route 135 and are used to supplement the surface water irrigation used on agricultural fields. The land area is bisected by East Main Street in Hopkinton. Other frontage roads include Wilson Street, Clinton Street, Curtis

Road, and Frankland Road in Hopkinton, and Olive Street, Howe Street, and Cross Street in the Town of Ashland.

1.3 Detailed Scope of Services

Haley & Aldrich performed the following detailed scope of services to complete our Phase I assessment:

1. Visual observations of site conditions, and of abutting property use, to evaluate the nature and type of activities that have been or are being conducted at and adjacent to the site, in terms of the potential for release or threat of release of hazardous substances or petroleum products.
2. Review of federal and state environmental database information within the ASTM-specified radii from the subject property using a database service to access records. Use of 7.5-minute topographic maps to evaluate the site's physical setting.
3. Review of state environmental files pertaining to the subject site and nearby sites with the potential to impact the subject site.
4. Review of the following sources of historical use information: information provided by the site contacts and Middlesex Conservation District aerial photographs.
5. Contacts with local municipal agencies regarding the site and surrounding properties and structures.
6. Interview with the Key Site Manager.
7. Interpretation of information and data assembled as a result of the above work tasks, and formulation of conclusions regarding the potential presence and impact of Recognized Environmental Conditions (RECs) as defined by the ASTM E 1527-00 Standard.

1.4 Non-Scope Considerations

The ASTM E 1527-00 Standard includes the following list of “additional issues” that are non-scope considerations outside of the scope of the ASTM Phase I practice: Asbestos-Containing Materials, Radon, Lead-Based Paint, Lead in Drinking Water, Wetlands, Regulatory Compliance, Cultural and Historic Risks, Industrial Hygiene, Health and Safety, Ecological Resources, Endangered Species, Indoor Air Quality, and High Voltage Powerlines. These items were not included in our assessment of the property. In addition, an assessment for the presence of mold or other biological pollutants is not included in this Phase I. These items were not included in our assessment of the property.

A limited assessment of the presence of PCBs is included in the ASTM work scope. Accordingly, our assessment of the presence of PCBs is limited to those potential sources specified in the ASTM Standard as “electrical or hydraulic equipment known or likely to contain PCBs...to the extent visually and or physically observed or identified from the interview or records review.”

1.5 Exceptions and Deviations

1.5.1 Exceptions

Haley & Aldrich has completed this assessment in substantial conformance with ASTM E 1527-00. In our opinion, there were no exceptions made to the ASTM work scope. However, snow cover across the vacant land parcels limited our observations.

1.5.2 Deviations

Haley & Aldrich completed this assessment in substantial conformance with the ASTM E 1527-00 Standard. In our opinion there were no additions made to or deviations and deletions made from the ASTM work scope in completing this Phase I. However, based on the size of the property, custom database radii were used in order to capture all regulated sites in proximity to the site.

1.6 Limitations

Our work for the Phase I portion of this project was performed generally consistent with the ASTM E 1527-00 Standard for Phase I Environmental Site Assessments. Several organizations other than ASTM, such as professional associations (e.g. ASFE and AGWSE) have also developed “guidelines” or “standards” for environmental site assessments. The Phase I presented herein is consistent with the ASTM E 1527-00 Standard, which may vary from the specific “guidelines” or “standards” required by other organizations.

This Report was prepared pursuant to an Agreement dated 3 March 2005 between Mezitt Agricultural Corporation and Haley & Aldrich, which Agreement is attached hereto and is made a part of this Report. All uses of this Report are subject to, and deemed acceptance of, the conditions and restrictions contained in the Agreement. The observations and conclusions described in this Report are based solely on the Scope of Services provided pursuant to the Agreement. Haley & Aldrich has not performed any additional observations, investigations, studies or other testing not specified in the Agreement. Haley & Aldrich shall not be liable for the existence of any condition the discovery of which would have required the performance of services not authorized under the Agreement.

This Report is prepared for the exclusive use of Mezitt Agricultural Corporation in connection with the potential acquisition of the subject property. There are no intended beneficiaries other than Mezitt Agricultural Corporation. Haley & Aldrich shall owe no duty whatsoever to any other person or entity on account of the Agreement or the Report. Use of this Report by any person or entity other than Mezitt Agricultural Corporation for any purpose whatsoever is expressly forbidden unless such other person or entity obtains written authorization from Mezitt Agricultural Corporation and from Haley & Aldrich. Use of this Report by such other person or entity without the written authorization of Mezitt Agricultural Corporation and Haley & Aldrich shall be at such other person’s or entity’s sole risk, and shall be without legal exposure or liability to Haley & Aldrich.

Use of this Report by any person or entity, including by Mezitt Agricultural Corporation, for a purpose other than for the potential divestiture of the subject property is expressly prohibited unless such person or entity obtains written authorization from Haley & Aldrich indicating that the Report is adequate for such other use. Use of this Report by any person or entity for

such other purpose without written authorization by Haley & Aldrich shall be at such person's or entity's sole risk and shall be without legal exposure or liability to Haley & Aldrich.

This report reflects site conditions observed and described by records available to Haley & Aldrich as of the date of report preparation. The passage of time may result in significant changes in site conditions, technology, or economic conditions, which could alter the findings and/or recommendations of the report. Accordingly, Mezitt Agricultural Corporation and any other party to whom the report is provided recognize and agree that Haley & Aldrich shall bear no liability for deviations from observed conditions or available records after the time of report preparation.

Use of this Report by any person or entity in violation of the restrictions expressed in this Report shall be deemed and accepted by the user as conclusive evidence that such use and the reliance placed on this Report, or any portions thereof, is unreasonable, and that the user accepts full and exclusive responsibility and liability for any losses, damages or other liability which may result.

2. SITE DESCRIPTION

2.1 Site Ownership and Location

2.1.1 Name of Site Owner

Mezitt Agricultural Corporation
72 East Main Street
Hopkinton, Massachusetts 01748

Peter J. Mezitt
72 East Main Street
Hopkinton, Massachusetts 01748

Estate of Peter J. Mezitt, Peter J. Mezitt, Trustee
72 East Main Street
Hopkinton, Massachusetts 01748

R. Wayne Mezitt/ Elizabeth P. Mezitt
72 East Main Street
Hopkinton, Massachusetts 01748

Carol Dodson Spengler (residence)
43 East Main Street
Hopkinton, Massachusetts 01748 (15 acres contribution identified as Lot C)

2.1.2 Name of Site Operator

Weston Nursery of Hopkinton
72 East Main Street
Hopkinton, Massachusetts 01748

Carol Dodson Spengler
43 East Main Street
Hopkinton, Massachusetts 01748 (15 acres contribution identified as Lot C)

2.1.3 Site Locus Map

The USGS topographic maps for the site are the Medfield, Milford, Marlboro, and Framingham, Massachusetts Quadrangles, dated 1987, 1982, 1983, and 1987, respectively (see Figure 1). The USGS topographic maps were used as the source for site setting information. The site is located in Middlesex County.

2.2 Site and Vicinity Description

- The subject site is approximately 615 acres in size. Figure 2 is a Site Plan of the subject property, including relevant site and immediately adjoining property features.

- The property consists of agricultural fields, woodland, and irrigation ponds used by Weston Nursery of Hopkinton. Site operations currently include those activities associated with commercial agricultural operations and are consistent with the sale of ornamental plants, tree, and shrubs.
- The site is zoned by the Town of Hopkinton as “A – Agricultural” and “R-B-Residential”. Areas located in the Town of Ashland are zoned “R-A-Residential”. Permitted site uses include single family dwellings, churches, public schools government buildings, and small agricultural uses.
- Permanent structures located on the subject site include an abandoned greenhouse along Curtis Road (located on Mezitt Agricultural field 52D), a single residential dwelling located on 26 Clinton Street, and a dormitory located on 44 Wilson Street. The abandoned greenhouse was formerly heated by a 275-gallon aboveground storage tank which is still present in the structure. This structure also was reported as historically operating a fuel oil UST. The UST was reportedly filled in place and abandoned on site. The Clinton Street dwelling utilizes fuel oil, stored in an AST located in the basement of the structure. The dormitory home is heated via a gas-fired boiler system.
- Potable water is supplied to the residence and group home via municipal water mains located along Clinton Street and Wilson Street. Each structure, including the greenhouse, utilizes septic leach fields for sanitary waste disposal.
- Electricity to the site is supplied by NSTAR.
- One cellular telephone transmitting tower is located on Lot A₂ (Mezitt Agricultural field 24A). The transmitting tower is operated by Sprint Spectrum L.P. The leased area is 3,600 square feet and includes the tower transformer and a surrounding chain linked fence.
- A total of four subsurface natural gas easement transverse the subject site.
- The area in the vicinity of the subject property is generally characterized as single family residential, small commercial operations, and vacant parcels. Exceptions to this description are areas immediately north and west of Lot A₂. These areas are used as the Hopkinton State Park/Hopkinton Reservoir and a natural gas storage and distribution facility, respectively, located on Wilson Road. In addition, Weston Nurseries operates portions of its retail operations along east Main Street and utilizes fields for agricultural purposes. A maintenance facility and refueling station is located on the Weston Nurseries parcel, adjacent to the southern part of Lot A₂. Included in this maintenance area are diesel/gasoline USTs and repair lifts.

2.3 Physical Setting

Subsurface explorations were not performed for this evaluation; therefore site geology and hydrology were evaluated on the basis of readily-available public information or references, and based upon the results of subsurface exploration programs previously conducted by Haley & Aldrich at the subject property.

2.3.1 Topography

Topographically, the site elevation ranges from El. 150 on Lot A₂ to El. 85 on Lot C. The topography of lots located north of Route 135 slopes to the north and west; areas south of Route 135 generally slope to the south.

2.3.2 Geologic Information

According to mapping provided by the Middlesex Conservation District, soils north of Route 135 are dominated by Mountauk fine sandy loam. This is a very deep, strongly sloping, well drained soil on the sides of upland hills. Areas of this soil are oval or irregular in shape and range from 6 to 40 acres. Large surface and subsurface stones and boulders may hinder excavation. This soil has good potential for farming.

Areas south of Route 135 are dominated by the Charlton Rock outcrop-Charlton complex. This map unit consists of gently sloping soils on uplands where the relief is affected by the underlying bedrock. The surface layer of the Charlton soil is black fine sandy loam about 1 inch thick. The subsurface layer is dark brown fine sandy loam about 5 inches thick. The subsoil is yellowish brown fine sandy loam about 30 inches thick. The substratum is light brownish gray sandy loam to a depth of 60 inches or more. In some areas, the surface layer is very fine sandy loam. The Charlton soil is well suited to use as sites for dwellings with basements and for septic tank absorption fields.

Several test pits were performed on Lot C by Haley and Aldrich in December 2003. The test pits indicated that this portion of Lot C is underlain by organic deposits, a thin layer of loess below which is glacial till. Haley & Aldrich would anticipate similar surface geology in other areas of the site. However, wetland areas, which are anticipated to comprise up to 1/3 of the land area, will have a higher proportion of organic material present.

Bedrock is anticipated between 5 and 10 feet below ground surface. The uppermost bedrock unit is mapped as the Milford Granite. The rock is described as gray, seriate to sub-porphyrific granite to granodiorite.

2.3.3 Ground Water and Surface Water Information

The topography of lots located north of Route 135 slopes to the north and west towards the Hopkinton Reservoir and associated wetland area. Areas south of Route 135 generally slope to the south, towards wetland areas, and eventually the Cold Spring Brook. Cold Spring Brook is a primary supply to the Ashland Reservoir, located approximately 1,000 feet east of the subject site. Surface water flow at the subject site is anticipated to follow topography.

Groundwater is estimated to be within 10 feet below ground surface across the majority of the site. Hydrogeologic investigations were not performed on the site for this investigation; therefore, it is unknown to what extent localized variations in groundwater depth and flow occur on the site. According to the Flood Insurance Rate

Map (FIRM) for the site, portions of the property, near suspect wetlands and surficial water bodies on Parcel C, are located within 100-year floodplain. The remainder of the property is located within an area of minimal flooding.

Developed portions of the site are serviced by the Hopkinton Water Department, which provides potable water to the Town of Hopkinton. According to the Key Site Manager, there are no monitoring wells located on the property; however, based on interviews with the Key Site Contact, two irrigation wells located on the property. According to the Key Site Manager the irrigation wells are located on Lot C (Mezitt Agricultural field 54A). These wells are reported to be approximately 20 to 25 feet deep.

The site is not shown within a local Aquifer Protection District, a Zone II or an Interim Wellhead Protection Area; thus, the appropriate groundwater classification for these areas is RCGW-2. The nearest drinking water source that appears to be present in this area is municipal drinking water wells near the Hopkinton Reservoir, approximately 500 feet north of the site. In addition according to the Ashland Health Department, residential properties immediately northwest of Lot A₁ are serviced by private potable wells.

The Conservation Commission representative reported that a Notice of Intent was filed on Lot A₂ (DEP file 188-1209); for work that appears to have been associated with construction of infrastructure for the cellular tower. No Certificate of Compliance indicating that the work conducted had been satisfactorily completed was available in the conservation commission files.

3. PREVIOUS REPORTS

Previous reports pertaining to the subject site were not made available to Haley and Aldrich, nor are we aware of any such reports.

4. SITE HISTORY

Past usage of the site and adjoining properties was assessed through a review of aerial photographs and information provided by the site contact.

4.1 Past Usage of the Site

Past usage of the site was assessed through a review of aerial photos as well as site interviews with persons knowledgeable about former site operations. Copies of historical references reviewed are included in Appendix B. Aerial photographs for the site, dated 1938, 1952, 1963, 1978, 1980, and 1995, were reviewed. Additionally, Roger Mezitt, who has lived near the property and been active in its use since the 1950s, is familiar with the site history of the property.

Mezitt Agricultural, which owns a majority of the landholding, purchased several lots during the 1940's and 1950's. The first lots, totaling approximately 300 acres (Tebeau and Himrod Farms) were originally purchased in 1944. In 1952, the Curtis farm (100 acres) and Busconi farmland located south of Route 135 were purchased and added to the overall land area.

■ Lots A₁ , A₂, and B

The 1938 aerial photograph indicates that Lots A₁, A₂ and B were largely woodland with several small farmhouses present. By 1952, Lots A₁ and A₂ appeared to be agricultural fields, while Lot B appeared to be wooded. No structures or evidence of disturbed land areas was observed on this photograph. Agricultural operations expanded on the lots by 1963, and the presence of a suspected farm dump is illustrated on the northwest side of Lot A₁ on the 1963 aerial photograph. During this time, Lot B appeared to remain as a wooded parcel. Aerial photographs from 1971, 1978, 1980, 1985, and 1995 show the site in a similar configuration; however, areas of disturbed land are illustrated on the northern, eastern, and central parcels of Lot A₁ which is consistent with farm dumps observed during the March 2005 assessment.

■ Lots C and D

The 1938 and 1952 aerial photographs indicate that lots C and D were a mixture of open agricultural land and woodland. A residence or farmhouse is illustrated at the current location of the house at 26 Clinton Street, and a structure and a driveway were located in the vicinity of the current greenhouse. Several areas of disturbed soils were illustrated on the 1963 aerial, on the south side of Lot C; however, these areas are shown as a pond and agricultural fields in the 1980 and 1995 aerial photos. The remainder of the property does not appear to have changed significantly since 1963 except for the addition of several roads on the southeastern portion of the property. The 1995 aerial photograph was similar to earlier photographs with the exception of the northwestern portion of the subject site, which appeared to be used as a compost area at the time of the photograph.

4.2 Past Usage of Adjoining Properties

Nearby land uses has historically been vacant woodland, agricultural fields and residential. Past usage of adjoining properties was assessed through a review of aerial photos as well as site interviews with persons knowledgeable about former site operations. Aerial photographs for the site, dated 1938, 1952, 1963, 1978, 1980, and 1995 were reviewed.

■ Lots A₁ , A₂, and B

Areas north of the property have been largely undeveloped since the 1938. Currently residences are located along Wilson Street. The Hopkinton State Park and local reservoir are historically illustrated north of the site. The Tennessee Gas storage and distribution facility is initially illustrated on the 1985 map along Wilson Road. Three gas holders are shown within 500 feet of the subject property.

Areas east of these lots were also historically wooded. By 1978, a test track, operated by Liberty Mutual Insurance, is shown beyond a wooded area on Frankland Road in Hopkinton. To the west, nearby properties are shown as largely wooded in the 1938, 1952, and 1963 aerial photographs. Residential properties have historically been located along Route 135, and more recently along Wilson Road.

Areas south of the site were used as agricultural fields by 1938. By 1963, the Weston Nursery maintained operations immediately south of the site and along East Main Street as a retail sales center. No significant change was noted in the 1978, 1980, and 1995 aerial photographs. Based on discussions with the Key Site Contact, Weston Nurseries has historically operated a maintenance facility and refueling station located on Phipps Road, adjacent to the southern part of Lot A₂.

■ Lots C and D

Areas north of Lots C and D have been occupied by residences since 1938. Beyond the residences, Route 135 (East Main Street) has run in its current course since 1938. Currently, residences, Route 135 (East Main Street) and portions of the Weston Nurseries are located north of the subject site.

The majority of areas south of the subject site, were wooded in 1938 and 1952. By 1963, Weston Nurseries appeared to begin developing areas south of the property for agricultural and horticultural use. The 1978, 1980, and 1995 photographs suggest that Weston Nurseries continued to occupy areas south of the site. Additionally, the pond that is currently located south of the property appears on the 1978, 1980, and 1995 photographs. Areas south of the property are currently occupied with fields and a pond owned by Mezitt Agricultural and operated by Weston Nurseries.

Areas east of Lots C and D are shown as agricultural fields, woodland and residential dwellings in 1938 and 1963. Aerial photographs from 1978, 1980, and 1995, show the area to the east as largely agricultural and residential; however, small commercial operations appear to be present in the site vicinity.

Areas west of Lots C and D appear to have been occupied with either fields or forest since 1938. Currently, a large wooded area is located west of the property.

5. ENVIRONMENTAL RECORDS REVIEW

5.1 Standard Environmental Records Review

Haley & Aldrich utilized the electronic database service Environmental Data Resources, Inc. to complete the environmental records review. The database search was used to identify properties that may be listed in the referenced Agency records, located within the ASTM-specified search radii indicated below. Based on the size of the site, the search radius was expanded to capture all nearby database listings. The radius is centered at a point along Phipps Road in Hopkinton.

- NPL sites: 1 mile
- CERCLIS sites:.....0.5 mile
- CERCLIS NFRAP sites Site and Adjoining
- Federal ERNS:Site Only
- RCRA non-CORRACTS TSD facilities:0.5 mile
- RCRA CORRACTS TSD facilities:..... 1 mile
- RCRA Generators: Site and Adjoining
- State Hazardous Waste Sites:..... 1 mile
- Registered Underground Storage Tanks: Site and Adjoining
- State Landfills and Solid Waste Disposal Sites:0.5 mile
- State Leaking Underground Storage Tanks:0.5 mile

Following is a summary of information provided for each of the above-listed databases. The complete environmental database report is provided in Appendix C.

5.1.1 NPL Sites

The National Priorities List (NPL) is a list of contaminated sites that are considered the highest priority for clean-up by the US Environmental Protection Agency (USEPA).

- The subject site is not listed on the NPL List.
- The database search did not identify NPL sites within a one-mile of the subject site boundary.

5.1.2 CERCLIS Sites

The Comprehensive Environmental Response, Compensation, and Liability Act Information System (CERCLIS) list identifies sites which are suspected to have contamination and require additional investigation to assess if they should be considered for inclusion on the NPL.

- The subject site is not listed on the CERCLIS List.
- The database search did not identify CERCLIS sites within a one-half mile of the subject site boundary.

5.1.3 CERCLIS-NFRAP Sites

CERCLIS-NFRAP status indicates that a site was once on the CERCLIS List but has No Further Response Actions Planned (NFRAP). Sites on the CERCLIS-NFRAP List were removed from the CERCLIS List in February 1995 because, after an initial investigation was performed, no contamination was found, contamination was removed quickly, or the contamination was not significant enough to warrant NPL status.

- The subject site is not listed on the CERCLIS-NFRAP List.
- The database search did not identify CERCLIS-NFRAP sites adjacent to the subject site.

5.1.4 Federal ERNS List

The Federal Emergency Response Notification System (ERNS) list tracks information on reported releases of oil and hazardous materials.

- The subject site is not identified on the Federal ERNS list.

5.1.5 RCRA non-CORRACTS TSD Facilities

The Resource Conservation and Recovery Act (RCRA) non-CORRACTS TSD Facilities List tracks facilities which treat, store, or dispose of hazardous waste and are not associated with corrective action activity.

- The subject site is not listed as a RCRA non-CORRACTS TSD facility.
- The database search did not identify RCRA non-CORRACTS TSD facilities within a one-half mile radius of the subject property.

5.1.6 RCRA CORRACTS TSD Facilities

The RCRA CORRACTS TSD Facilities list catalogues facilities that treat, store, or dispose of hazardous waste and have been associated with corrective action activity.

- The subject site is not listed as a RCRA CORRACTS TSD facility.
- The database search did not identify RCRA CORRACTS TSD facilities within a one-mile radius of the subject property.

5.1.7 RCRA Generators

The RCRA Generator list is maintained by the USEPA to track facilities that generate hazardous waste.

- The subject site is not listed as a RCRA Hazardous Waste Generator.
- One property adjoining the subject site is listed as a RCRA Generator.

Weston Nurseries, 30 Phipps Street, Hopkinton (Map ID #A1): This property is located adjacent to Lot A₂. Based on observations made during our site reconnaissance, this property contains refueling and farm equipment repair facilities operated by Weston Nurseries. This facility was identified as a conditionally exempt small quantity hazardous waste generator. No violations were reported at the site. The facility is included on the State Sites list for a release from a UST; more information concerning this RTN is summarized below.

5.1.8 State Sites and State Spill Sites

The State Hazardous Waste Sites (SHWS) and Release lists are maintained by the Massachusetts Department of Environmental Protection, in order to track sites where releases of oil or hazardous materials have occurred.

- The database search identified 30 State Sites and 46 State Spill Sites within a one-mile radius of the subject site. Based on their location in relation to the subject site, the following six state sites were considered to have the potential to influence the subject property.

Weston Nurseries, 30 Phipps Street, Hopkinton (RTN 2-1102, Map ID A2): This property is located adjacent to Lot A₂. In 1993, petroleum contamination was noted during the removal of a UST on the property. In 1997, Phase I investigations confirmed the presence of contaminated soil. Concentrations of petroleum contaminants exceeded MCP RCS-1 reportable concentrations and were reported to the DEP. The site was subsequently classified as a Tier II disposal site.

Release Abatement Measure (RAM) activities, which originally were to include the removal of a 10,000-gallon UST, the removal of approximately 400 cubic yards of petroleum contaminated soil, and the filling of excavated areas with clean fill, were initiated in 1998. Because volatile organic compounds (VOCs) were later discovered at the site, a modified RAM including the addition of a Soil Vapor Extraction (SVE) system to the UST and soil removal activities.

In August 1999, a Phase II Comprehensive Site Assessment, Phase III Remedial Action Plan, and modified RAM plan were submitted to DEP. These documents identified two separate areas of concern at the Weston Nurseries site. The first, in the area adjacent to the northeast side of a repair garage, consisted of waste oil impacted soil in depths ranging from 9 to 13 feet. This portion of the site was called “Area 1”. The second, in the vicinity of the fuel pump island, consisted of gasoline contamination, and is referred to as “Area 2”. A Phase IV Remedial Action Plan (RAP) was submitted to DEP on 10 July 2002. This RAP only included “Area 2”; “Area 1” was not included in the RAP because the necessary steps to clean up “Area 1” were considered too costly at the time and not economically justified. Action Environmental, the consultant for the site, noted that the implementation of an AUL would be pursued for “Area 1”. Phase IV actions at “Area 2” included the removal of 5,746 cubic yards of contaminated soil. After a series of confirmatory tests and segregation of soil, contaminated (above designated background levels) soil was removed to a soil recycling facility while clean (at or below designated background

levels) soils were used as backfill at the site. During the excavation, 8,600 gallons of contaminated groundwater were recovered, treated by a dual-canister activated carbon treatment system, and discharged.

A partial Response Action Outcome (RAO) (including “Area 2”, but not “Area 1”) was submitted to DEP on 27 September 2002. This partial Class A-2 RAO included a Risk Characterization that indicated a level of “No Significant Risk” existed on the site. An Activity and Use Limitation was not included as part of this RAO.

In October 2004, the RAO for Area 2 was retracted following review by the DEP, because additional actions were required to determine a condition of no significant risk was present. Specific deficiencies identified by the DEP included the failure to define the horizontal and vertical extent of contamination at the site as well as failure to evaluate all contaminants of concern.

On 15 April 2005, Environmental Compliance Services (ECS) re-submitted a Class A-2 RAO both Area 1 and Area 2, and addressed deficiencies noted by the DEP. As a part its activities, ECS installed 12 soil boring, with four locations converted to groundwater monitoring wells in Area 2. ECS also collected a sample from the abandoned floor drain in the adjacent garage to assess its potential for a contaminant migration pathway. Two additional soil borings/monitoring wells were installed in Area 1. Contamination detected was largely restricted to petroleum constituents that would be anticipated for waste oil, diesel fuel, and gasoline releases. However, elevated arsenic was detected in the abandoned garage drain. This drain leads to a septic tank, and eventually discharges to a retention basin, which is suspected to be on the subject site. Follow-up sampling at the outfall by ECS did not detect arsenic above method detection limits. Based on the additional data collected, a Method 1/Method 3 (Soil in Area 2 tank grave) Risk Assessment was completed by ECS. All groundwater collected in the ECS evaluation was below the applicable Method 1 standard for GW-2/GW-3.

Based on the recent sampling, and lack of groundwater contaminants above applicable risk assessment standards, it is considered unlikely that the subject site has been impacted by this release. Further, sampling of sediment near the outfall on the subject site did not indicate the presence of metals which were identified in the garage drain. However, in the event that conditions at Weston Nursery (namely the petroleum and waste oil release locations) impacted the subject site, it would likely be eligible for Downgradient Property Status (DPS) which would relieve the property owner from conducting response actions for releases migrating from an off-site groundwater contamination source, provided the property owner complies with the general requirements of 310 CMR 40.0183.

Hopkinton LNG Group, 52 Wilson Street, Hopkinton (RTN 2-10740, Map ID 9):
This property is located immediately adjacent to Lots A₁ and A₂, along Wilson Street and potentially upgradient of the subject site. On 21 April 1995, a sudden release of approximately 200 gallons of 2-amino-ethanol occurred at the LNG storage and distribution facility. The release was reported to DEP as a 2-hour reporting condition.

Immediate Response Actions (IRA) activities, which included the removal of impacted material was completed following the verbal notification to the DEP. A Class A-2 Response Action Outcome (RAO) was submitted to DEP on 23 August 1995.

Based on the limited nature of the release event and subsequent response actions, this release is not anticipated to adversely impact conditions at the subject site.

290 Howe Street, Ashland (RTN 2-19932, Map ID 10): This site is located approximately 0.1 mile north of the subject site. On 14 September 2000, approximately 240 gallons of oil (non-PCB) was spilled from a transformer. Immediate Response Actions removed approximately 11 cubic yards of contaminated soil from the site. The site excavation measured approximately 10 feet by 10 feet, and was an estimated 7 feet deep. Contamination reportedly did not impact storm drains, sewers or other types of drains. Post-excavation samples were at or approached background for EPH, and a Class A-1 RAO was issued on 6 October 2000. Based on the RAO status, this spill is not anticipated to affect the subject property.

Terry's Oil Co., 96 East Main Street, Hopkinton (RTN 2-1041, Map ID 4): Although this site is identified as being adjacent to the subject site on the database report, it appears that Terry's Oil Co. was not identified correctly in the database search. The actual location of the Terry's Oil Co. is more than one mile west of the subject property; thus, Terry's Oil Co. is not expected to adversely affect the subject property.

Pole 33 of 52, 80 East Main Street (RTN 2-10442, Map ID 7): This site is located approximately 0.1 mile northeast of the subject site. On 24 August 1994, approximately 25 gallons of oil (non-PCB) was spilled from a transformer. Immediate Response Actions removed approximately 7-8 cubic yards of contaminated soil from the 80 East Main Street site (a residence). The soils removed from the site were from depths ranging from 0-3 feet, and the contamination did not purportedly reach storm drains, sewers or other types of drains. Post-excavation samples did not achieve background for TPH, but the results of a Method 1 Risk Characterization revealed that a condition of "No Significant Risk" was achieved at the 80 East Main Street site. Based on the condition of "No Significant Risk" as well as the small amount of oil released, this spill is not anticipated to affect the subject property.

Norton & Haines Transport, 105 East Main Street (RTN 2-10624, Map ID B6): This site is located approximately 0.25-mile northeast of Lot C. On 13 January 1995, the DEP was notified that a No. 2 fuel oil tank had leaked at the 105 East Main Street property. Soil and groundwater had been impacted by the leak. As part of an Immediate Response Action, 35 cubic yards of soil was removed. Samples taken from monitoring wells in the vicinity of the spill, indicated that groundwater had not been significantly impacted by the release. A Class A-2 Response Action Outcome (RAO) was submitted to DEP on 18 January 1996. The RAO, however, was audited by the DEP because information was missing from the RAO submitted to the DEP. On 13 December 1996, the missing information was provided to DEP, and the case was considered closed. Because of the site's RAO status as well as the site's cross-gradient position to the subject site, the 105 East Main Street property is not expected to adversely influence the subject property.

5.1.9 Registered Underground Storage Tanks (USTs)

The Department of Public Safety maintains a list of USTs registered with the Office of the Fire Marshall.

- The subject site is not identified as a registered UST list.
- There are no properties adjacent to the subject site listed on the registered UST list.

5.1.10 State Landfills and Solid Waste Disposal Sites

- The database search identified one Solid Waste Disposal Site within a one-half mile radius of the subject site.

Weston Nurseries Compost Site, East Main St. (Map ID, Non-geocoded): The Weston Nurseries Compost site is located in the northeast portion of the subject site. The database report indicates that the site is a registered yard waste composting site. According to on-site personnel, the compost site can receive compostable waste such as leaves, lawn clippings, weeds, sawdust, old mulch, manure, peat, and other clean organic matter, as well as brush such as plant trimmings, branches, tops of discarded plants, whole plants with soil removed, and logs of specific lengths.

5.1.11 State Leaking Underground Storage Tanks

In Massachusetts, the State Hazardous Waste Sites list typically includes locations of Leaking Underground Storage Tanks. Refer to discussion of State Sites above for site impacted by Leaking Underground Storage Tanks.

5.2 Additional Environmental Records Review

In conformance with ASTM, inquiry was made with representatives of the agencies described below and with the user of this Phase I.

5.2.1 Board of Health

A review of files was conducted at the Town of Hopkinton and Town of Board of Health by Haley & Aldrich, Inc. on 29 March 2005. The Hopkinton Board of Health did not have any records for the subject or surrounding properties. No record of the irrigation wells on Lot C was identified in the Health Department records. Hopkinton Health personnel confirmed that area homes are on septic systems and are primarily serviced with municipal water. The Town of Hopkinton and Town of Ashland share municipal supply wells and treatment facility, immediately adjacent to the Hopkinton reservoir, north of Lot A₂. The Town of Ashland noted that properties abutting the subject site (Lot A₂) are not on municipal water and operate private wells.

5.2.2 Fire Department

Documents concerning the subject site were not observed at the Fire Department. AST and UST records were identified for residential properties and the Tennessee Gas property on Wilson road, and residential properties on Clinton Street. Removal records were available for several of the off-site USTs and included notes from the fire department. Fire department removal records did not suggest a release of oil according to fire department personnel; however, no confirmatory soil/groundwater sampling information was available.

5.2.3 Building Department

Information on file with the Hopkinton Building Department included Certificates of Inspection of the South Middlesex Opportunity Council property located on 44 Wilson Street (dormitories). Additional building permits included the repair and deleading of window areas of the site building. One listing for 26 Clinton Street was limited to asphalt shingle replacement of the residential structure in 1994. No violations were identified for site buildings.

5.2.4 Tax Assessor

Several field cards for the parcels included in the subject property were viewed and are included in Appendix C.

5.2.5 User-Provided Information

The ASTM Standard requires disclosure in the Phase I report whether the user of the report has specialized knowledge about previous ownership or uses of the property that may be material to identifying RECs, or whether the user has determined that the property's Title contains environmental liens or other information related to environmental condition of the property, including engineering and institutional controls and Activity and Use Limitations, as defined by ASTM. In addition, we are required by the ASTM Standard to inquire whether the user of the report has prior knowledge that the price of the property has been reduced for environmentally-related reasons. As of this report preparation, Haley & Aldrich has not been informed by the user that there are liens or other information about the environmental condition of the property in the Title. In addition, the user has not indicated specialized knowledge about previous ownership or uses of the property that may be material to identifying RECs, and has not indicated that the price of the property has been reduced for environmentally-related reasons.

6. SITE RECONNAISSANCE AND KEY PERSONNEL INTERVIEW(S)

A site visit to observe site conditions was conducted by David T. Montplaisir of Haley & Aldrich, Inc. on 25 March 2005. Access to the site was provided by Roger Mezitt of Mezitt Agricultural Corporation. Haley & Aldrich personnel conducted a vehicular and perimeter walk of key exterior features, including developed areas and known solid waste disposal areas. Haley & Aldrich also observed accessible interior areas of the site buildings. Snow cover present at the time of the site visit limited our observations.

Interviews with Mr. Mezitt were performed in conjunction with the site reconnaissance. Interviews with building tenants were not necessary due to the nature of the site use and familiarity of Mr. Mezitt with site operations. The findings of the site visit and interviews are discussed below. Site photographs are included in Appendix C, and interview documentation is included in Appendix D.

ASTM Section 9.8 requires that, prior to the site visit, the current site owner or Key Site Manager and user, if different from the current owner or Key Site Manager, be asked if there are any helpful documents that can be made available for review. These consist of environmental site assessment reports, audits, permits, tank registrations, Material Safety Data Sheets, Community Right-to-Know plans, safety plans, hydrogeologic or geotechnical reports, or hazardous waste generator reports. No records, beyond site maps, were available for the site.

6.1 Current Use of the Property

The subject site is comprised of 32 land parcels in the Town of Hopkinton and Town of Ashland totaling approximately 615 acres. The property consists primarily of agricultural fields, woodland, suspect wetland areas, and ponds/tributaries. The land area is bisected by East Main Street in Hopkinton. Other frontage roads include Wilson Street, Clinton Street, Curtis Road, and Frankland Road in Hopkinton, and Olive Street, Howe Street, and Cross Street in the Town of Ashland.

Significant improvements to the site are limited to a residential property identified on Hopkinton Map R14 Block 9 (26 Clinton street), dormitories leased by the South Middlesex Opportunity Council located on Hopkinton Map R13 Block 8 (44 Wilson Street), and a cellular telephone transmitting tower located on Hopkinton Map R13 Block 9 which is leased to Sprint Spectrum L.P. Additional features include covered greenhouse structures and natural gas easements across the site.

Two water extraction wells are located on the south side of Route 135 and are used to supplement irrigation ponds during low water periods.

6.2 Site Visit Observations

A. General Description of Structures

Significant improvements to the site are limited to a residential property identified on Hopkinton Map R14 Block 9 (26 Clinton Street), dormitories leased by the South Middlesex Opportunity Council located on Hopkinton Map R13 Block 8 (44 Wilson Street), and a cellular telephone transmitting tower located on Hopkinton Map R13 Block 9, which is leased to Sprint Spectrum L.P. Additional natural gas easements across the site.

B. Heating and Cooling System

The abandoned greenhouse was most recently heated by a 275-gallon aboveground storage tank which is still present in the structure (refer to section F below for discussion on former USTs at this location). The Clinton Street dwelling utilizes fuel oil stored in an AST located in the basement of the structure. No evidence of a release from oil heating equipment was noted during the site investigation. The dormitory is heated via a gas-fired boiler system. Reportedly, no air conditioning systems are in use at the site.

C. Potable Water Supply and Sewage Disposal System or Septic Systems

Potable water is supplied by the Hopkinton Water Department. Water service is limited to the residence on Clinton Street and group home on Wilson Street, but is available for future developments in the area. A septic system is purportedly located near the greenhouse, group home and residence on Clinton Street.

D. Use of Petroleum Products and Hazardous Materials

The site utilized oil to heat the former greenhouse and residence at Clinton Street. Herbicides, fungicides, and pesticides were typically applied to growing fields as a part of its operation as a nursery. According to the Key Site Manager, these chemicals have been applied in accordance with labeling instructions since the use of agricultural chemicals were initiated in the 1950s and 1960s.

E. Storage of Petroleum Products and Hazardous Materials

Petroleum products stored on the site are limited to 275-gallon storage tanks located in the former greenhouse and basement of 26 Clinton Street. No staining or other evidence of release was noted during the inspection of these areas. No other oil and hazardous materials are stored on the subject site.

F. Underground and Aboveground Storage Tanks (USTs and ASTs)

The No. 2 fuel oil that heated the greenhouse is stored in the eastern portion of the greenhouse in a 275-gallon aboveground storage tank. According to the Key Site Contact, a UST was previously used for the greenhouse heating fuel. This UST was reportedly drained and filled with an inert material. No information regarding the closure of the UST, including soil sampling and analysis was available from the site

contact or in municipal files; however, it has not been determined whether the UST is located on the lot owned by Mezitt Agricultural Corporation, or the residential building at 16 Curtis Road. No evidence of the UST (i.e., fill pipes or vent pipes) suggesting the UST location were observed during the Haley & Aldrich site visit.

The AST in the 26 Clinton street property is located in the basement of the structure, in proximity of the boiler unit. ASTs are not equipped with secondary containment.

G. Disposal of Petroleum Products and Hazardous Materials

No special disposal practices are conducted or are necessary at the subject site. The Key Site Contact indicated that areas of the 615-acre property were historically used as farm dumps as part of site operations. See discussion on waste filling below.

H. Hydraulic Elevators

According to the Key Site Manager, there are no elevators on the property. No elevators were observed during the site reconnaissance.

I. Vehicle Maintenance Lifts

According to the Key Site Manager, there are no vehicle maintenance lifts on the property. No vehicle maintenance lifts were observed during the site reconnaissance.

J. Emergency Generators and Sprinkler System Pumps

According to the Key Site Manager, there are no emergency generators or sprinkler system pumps on the subject property. No emergency generators or sprinkler system pumps were observed during the site reconnaissance.

K. PCBs Associated with Electrical or Hydraulic Equipment

According to the Key Site Manager, no interior transformers are present in the site buildings. Two pad mounted transformer were observed outside the dormitories leased by the South Middlesex Opportunity Council and adjacent to the cellular telephone tower. Reportedly, there have not been issues associated with the transformer. The equipment was observed to be situated on concrete pads. Staining was not observed on the concrete underneath the equipment, and labels were not observed on the transformer. No labeling indicating the PCB content of the transformers was identified; however, based on the date of construction of the South Middlesex Opportunity Council dormitories and cellular tower, it is unlikely that PCB containing dielectric fluids are present in the units.

L. Floor Drains and Sumps

No floor drains or sumps were observed in the site buildings.

M. Catch Basins

Catch basins were not observed on the subject property during the Haley & Aldrich assessment.

N. Dry Wells

According to the Key Site Manager, there are no dry wells located at the subject property. None were observed during the site visit.

O. Pits, Ponds, Lagoons, and Pools of Liquid

According to the Key Site Manager, ponds located at the subject property are used as irrigation supplies for Weston Nurseries. No pits, lagoons, or pools of liquid were observed during the site visit.

P. Odors

No unusual odors were noted during the site reconnaissance.

Q. Stains or Corrosion on Floors, Walls, or Ceilings

No stains or corrosion were observed on the floors, walls, or ceilings of the site buildings.

R. Stained Soil or Pavement

No stained soil was observed during the assessment of the site property.

S. Stressed Vegetation

No evidence of stressed vegetation was not observed during our site visit.

T. Solid Waste and Evidence of Waste Filling

Based on discussions with the Key Site Contacts and site observations, three areas on Lot A₂ were identified as areas where historic disposal of general farm wastes, including empty pesticide/herbicide containers and solid debris occurred. At the time of the site visit, transite panels suspected to contain asbestos were observed on Lot A₂ (Mezitt Agricultural field designation 20A). These materials were reportedly from former greenhouses on the property. The majority of the panels were intact; however, there was evidence that several panels had been damaged during the disposal activities. One disturbed area was also observed in a 1955 aerial photograph

of Lot C area, and may have been used as a historical dump area. This area is currently used as a composting area.

U. Wastewater and Stormwater Discharge

According to the Key Site Manager, there are no wastewater discharges from the site. Stormwater from the site infiltrate the ground surface or is directed to small tributaries leading to site surface water features.

V. Monitoring, Water Supply, or Irrigation Wells

Two production wells are also located on the southern side of Route 135. These wells are approximately 20-25 feet deep and are used as a supplemental supply for the irrigation system. No monitoring wells or potable water supplies are reportedly located at the subject property.

W. Sanitary Sewer and Septic Systems

Sanitary sewer service is not available to this portion of the Town of Hopkinton and Town of Ashland. According to the Key Site Manager, the residential property identified on Hopkinton Map R14 Block 9 (26 Clinton street) and dormitories leased by the South Middlesex Opportunity Council located on Hopkinton Map R13 Block 8 (44 Wilson Street) each have septic systems present. No issues related to the operation of the septic systems have been reported. Further, based on the residential nature of the structures, the use of septic systems is not considered a significant environmental concern.

7. FINDINGS AND CONCLUSIONS

Haley & Aldrich, Inc., has performed a Phase I Environmental Site Assessment of the Hopkinton Farms property in the Town of Hopkinton and Town of Ashland, Massachusetts. The scope of work is described and conditioned by our proposal dated 3 March 2005. As indicated in our proposal, the Phase I portion of this work was performed in conformance with the scope and limitations of the ASTM E 1527-00 Standard. Exceptions to, or deletions from, this practice are described in Section 1 of this report. Our conclusions are intended to help the user evaluate the “business environmental risk” associated with the site, as defined in the ASTM E 1527-00 Standard and discussed in the Introduction section of this report.

RECOGNIZED ENVIRONMENTAL CONDITIONS

The goal of the ASTM E 1527-00 Standard practice is to identify Recognized Environmental Conditions (RECs), as defined in the Standard and in Section 1 of this report.

This assessment has not revealed evidence of recognized environmental conditions in connection with the property.

HISTORICAL RECs AND KNOWN OR SUSPECT ENVIRONMENTAL CONDITIONS

The ASTM E 1527-00 Standard also requires that historical RECs (HRECs) and other known or suspect environmental conditions (KECs and SECs, respectively), as defined in the Standard and in Section I of this report, be identified in the Phase I. The standard defines historical RECs as environmental conditions “which in the past would have been considered a recognized environmental condition, but which may or may not be considered a recognized environmental condition currently.” The term “known or suspect environmental condition” is not specifically defined in the standard, but is used by Haley & Aldrich to highlight environmentally-related information that is not anticipated to adversely affect the subject site and/or does not rise to the level of a REC.

KEC #1: Fuel Oil UST at Former Greenhouse – Curtis Road

A no. 2 fuel oil underground storage tank (UST) was reportedly abandoned adjacent to the greenhouse near a residential structure at 16 Curtis Road. No information on the UST size was identified. However, based on the nature of the site operation, Haley & Aldrich would anticipate a 200 to 1,000 gallon UST to be present. According to the Key Site Contact, the UST was drained and filled with an inert material. No information regarding the closure of the UST, including soil sampling and analysis was available from the site contact or in municipal files. It has not been determined where the UST is located on the lot owned by Mezitt Agricultural Corporation, or the residential building at 16 Curtis Road. No evidence of a UST (i.e., fill pipes or vent pipes) suggesting the UST location was identified during the Haley & Aldrich site visit was identified.

KEC #2: Operation of Farm Dumps

The Key Site Contact indicated that areas of the 615-acre property were historically used as a farm dumping areas. Based on discussions with the Key Site Contacts and site observations, three areas on Lot A₂, were identified as areas where historic disposal of general farm wastes, including empty pesticide/herbicide containers and solid debris occurred. At the time of the site visit, suspect asbestos containing materials (ACM) transite panels were also observed on

Lot A₂ (Mezitt Agricultural field designation 20A). These materials were reportedly from former greenhouses on the property. The majority of the panels were intact. However, there was evidence that several panels had been damaged during disposal activities. One disturbed area was also observed in a 1955 aerial photograph of Lot C area, and may have been used as an historical dump area.

SEC #1: Release at Weston Nursery Property

This property is located adjacent to Lot A₂. In 1993, petroleum contamination was noted during the removal of a UST on the property (DEP RTN #2-1102). A Phase IV Remedial Action Plan (RAP) was submitted to DEP on 10 July 2002. This RAP only included a portion of the disposal site, identified as “Area 2”, and described as the former gasoline and diesel fueling station release area. “Area 1”, near the former waste oil UST was not included in the RAP because the necessary steps to clean up “Area 1” was described as being too costly to achieve a permanent solution at that time. Action Environmental, the consultant for the site, noted that the implementation of an AUL would be pursued for “Area 1”. Phase IV actions included the removal of 5,746 cubic yards of contaminated soil. After a series of confirmatory tests, contaminated (above designated background levels) soil was removed to a soil recycling facility while clean (at or below designated background levels) soils were used as backfill at the site. During the excavation, 8,600 gallons of contaminated groundwater were recovered, treated by a dual-canister activated carbon treatment system, and discharged.

A partial Response Action Outcome (RAO) (including “Area 2”, but not “Area 1”) was submitted to DEP on 27 September 2002. This partial Class A-2 RAO included a Risk Characterization that indicated a level of “No Significant Risk” existed on the site. An Activity and Use Limitation was not included as part of this RAO.

In October 2004, the RAO for Area 2 was retracted following review by the DEP, because additional actions were required to determine a condition of no significant risk was present. Specific deficiencies identified by the DEP included the failure to define the horizontal and vertical extent of contamination at the site as well as failure to evaluate all contaminants of concern.

On 15 April 2005, Environmental Compliance Services (ECS) re-submitted a Class A-2 RAO both Area 1 and Area 2, and addressed deficiencies noted by the DEP. As a part its activities, ECS installed 12 soil boring, with four locations converted to groundwater monitoring wells in Area 2. ECS also collected a sample from the abandoned floor drain in the adjacent garage to assess its potential for a contaminant migration pathway. Two additional soil borings/monitoring wells were installed in Area 1. Contamination detected was largely restricted to petroleum constituents that would be anticipated for waste oil, diesel fuel, and gasoline releases. However, elevated arsenic was detected in the abandoned garage drain. This drain leads to a septic tank, and eventually discharges to a retention basin, which is suspected to be on the subject site. Follow-up sampling at the outfall by ECS did not detect arsenic above method detection limits. Based on the additional data collected, a Method 1/Method 3 (Soil in Area 2 tank grave) Risk Assessment was completed by ECS. All groundwater collected in the ECS evaluation was below the applicable Method 1 standard for GW-2/GW-3.

Based on the recent sampling, and lack of groundwater contaminants above applicable risk assessment standards, it is considered unlikely that the subject site has been impacted by this release. Further, sampling of sediment near the outfall on the subject site did not indicate the

presence of metals which were identified in the garage drain. However, in the event that conditions at Weston Nursery (namely the petroleum and waste oil release locations) impacted the subject site, it would likely be eligible for Downgradient Property Status (DPS) which would relieve the property owner from conducting response actions for releases migrating from an off-site groundwater contamination source, provided the property owner complies with the general requirements of 310 CMR 40.0183.

8. CREDENTIALS

This report was prepared by David T. Montplaisir, under the supervision of Deborah H. Gevalt, who served as the Project Manager and Officer-in-Charge of this project. Qualification information for the project personnel is provided below.

DEBORAH H. GEVALT, P.G., L.S.P., Senior Vice President

As a Principal in the Boston office, Ms. Gevalt is responsible for the overall direction of the group's activities as well as serving as officer-in-charge of environmental site evaluations, remedial investigation/feasibility studies, and remedial design and implementation projects.

Ms. Gevalt's experience includes the evaluation and remediation of a wide variety of sites such as former gas stations, chemical plants, industrial facilities, and retail and commercial developments. She is responsible for tracking changes in environmental legislation and regulations, and for interaction with regulatory agencies relative to permitting, site assessment and remedial action. Ms. Gevalt has published and spoken widely on topics related to hazardous waste laws and regulation, particularly as they apply to site characterization and remediation. She has provided technical support and expert witness testimony for environmental litigation.

Ms. Gevalt was appointed by the Governor of the Commonwealth of Massachusetts to the Board of Registration of Hazardous Waste Site Cleanup Professionals in 1992. The Board is responsible for the licensing of Waste Site Cleanup Professionals (Licensed Site Professionals-LSPs) who conduct work under the new Massachusetts Contingency Plan (MCP). Ms. Gevalt was designated an LSP in the initial stages of licensing prior to the promulgation of the new MCP on 1 October 1993.

DAVID T. MONTPLAISIR, Senior Environmental Geologist

Mr. Montplaisir serves as Sr. Environmental Geologist for due diligence, Massachusetts Contingency Plan site investigations, and remediation projects. In his 14 years of experience in the environmental consulting industry, he has managed and conducted over 500 environmental due diligence evaluations of manufacturing facilities in all major industrial groups throughout North America and Asia. Mr. Montplaisir has spent the last two years working in the United Kingdom on similar projects throughout Europe and North Africa.

REFERENCES

1. Aerial photos dated 1938, 1952, 1963, 1978, 1980, and 1995, provided by EDR data resources.
2. Aerial photos dated 1938, 1952, 1971, and 1985, reviewed at the Middlesex Conservation District, Westford, Massachusetts, 29 March, 2005.
3. Environmental Data Resources, Inc., Database Report, dated 22 March 2005.
4. Haley & Aldrich, Inc., site visit conducted by David T. Montplaisir on 25 March 2005.
5. Roger Mezitt, interview with Haley & Aldrich, Inc., 25 March 2005.
6. Massachusetts Department of Environmental Protection, Northeast Regional Office File Review Center, 35 Congress Street, Salem, Massachusetts, review of files by Haley & Aldrich, Inc., 24 March 2005.
7. Topographic Map, Medfield, Milford, Marlboro and Framingham Massachusetts Quadrangles, United States Geological Survey 7.5 minute series, 1987, 1982, 1983, and 1987.
8. Town of Ashland Assessor's Department, review of files by Haley & Aldrich, Inc., 28 March 2005.
9. Town of Ashland Health Department, review of files by Haley & Aldrich, Inc., 28 March 2005.
10. Town of Hopkinton Assessor's Department, review of files by Haley & Aldrich, Inc., 22 March 2005.
11. Town of Hopkinton Board of Health, review of files by Haley & Aldrich, Inc., 22 March 2005.
12. Town of Hopkinton Building Department, review of files by Haley & Aldrich, Inc., 22 March 2005.
13. Town of Hopkinton Clerks Department, review of files by Haley & Aldrich, Inc., 22 March 2005.
14. Town of Hopkinton Conservation Commission, review of files by Haley & Aldrich, Inc., 22 March 2005.

APPENDIX A

Haley & Aldrich proposal dated 3 March 2005

APPENDIX B

Aerial Photographs and Lot/Block Designations

APPENDIX C

Regulatory Records Documentations

APPENDIX D

Site Photographs

APPENDIX E

Interview Documentation