

EXHIBIT 4

Response Action Outcome Statement

Medfield State Hospital

DEP Release Tracking Number: 3-1684

Camp Dresser & McKee Inc.

December 28, 1998



Camp Dresser & McKee Inc.

consulting
engineering
construction
operations

Ten Cambridge Center
Cambridge, Massachusetts 02142
Tel: 617 252-8000 Fax: 617 621-2565

December 28, 1998

Massachusetts Department of Environmental Protection
Southeast Regional Office
20 Riverside Drive
Lakeville, MA 02347

Subject: Response Action Outcome Statement Submittal
Medfield State Hospital - RTN: 3-1684
Medfield, Massachusetts

Dear Sir:

On behalf of Medfield State Hospital, Camp Dresser & McKee Inc. (CDM) hereby submits the attached Response Action Outcome Statement for the Medfield State Hospital Power Plant Site identified under Release Tracking Number 3-1684.

Please note that the LSP of record for the site has changed from Kenneth Snow, LSP # 3266 to William Swanson, LSP # 6406.

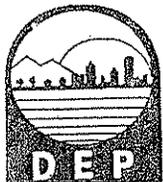
Please contact Jack Hoar at (617) 252-8748 or Bill Swanson at (617) 252-8458 if you have any questions or comments regarding this matter.

Very truly yours,

CAMP DRESSER & MCKEE INC.

Jack Hoar, P.E.

cc: George Camougis, DMH
Carol Jalbert, DMH
Joseph Minukas, Medfield State Hospital



RESPONSE ACTION OUTCOME (RAO) STATEMENT &
DOWNGRAIDENT PROPERTY STATUS TRANSMITTAL FORM

Release Tracking
Number

3 - 1684

Pursuant to 310 CMR 40.0180 (Subpart B), 40.0580 (Subpart E) & 40.1056 (Subpart J)

A. SITE OR DOWNGRAIDENT PROPERTY LOCATION:

Site Name: (optional) Medfield State Hospital Power Plant Site

Street: 45 Hospital Road Location Aid: Facility Power Plant

City/Town: Medfield ZIP Code: 02052-0000

Check here if this Site location is Tier Classified. If a Tier I Permit has been issued, state the Permit Number: _____

Related Release Tracking Numbers that this Form Addresses: _____

If submitting an RAO Statement, you must document the location of the Site or the location and boundaries of the Disposal Site subject to this Statement. If submitting an RAO Statement for a PORTION of a Disposal Site, you must document the location and boundaries for both the portion subject to this submittal and, to the extent defined, the entire Disposal Site. If submitting a Downgradient Property Status Submittal, you must provide a site plan of the property subject to the submittal and, to the extent defined, the Disposal Site.

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

Submit a Response Action Outcome (RAO) Statement (complete Sections A, B, C, D, E, F, H, I, J and L).

Check here if this is a revised RAO Statement. Date of Prior Submittal: _____

Check here if any Response Actions remain to be taken to address conditions associated with any of the Releases whose Release Tracking Numbers are listed above. This RAO Statement will record only an RAO-Partial Statement for those Release Tracking Numbers.

Specify Affected Release Tracking Numbers: _____

Submit an optional Phase I Completion Statement supporting an RAO Statement or Downgradient Property Status Submittal (complete Sections A, B, H, I, J, and L).

Submit a Downgradient Property Status Submittal (complete Sections A, B, G, H, I, J and K).

Check here if this is a revised Downgradient Property Status Submittal. Date of Prior Submittal: _____

Submit a Termination of a Downgradient Property Status Submittal (complete Sections A, B, I, J and L).

Submit a Periodic Review Opinion evaluating the status of a Temporary Solution (complete Sections A, B, H, I, J and L).

Specify one: For a Class C RAO For a Waiver Completion Statement indicating a Temporary Solution
Provide Submittal Date of RAO Statement or Waiver Completion Statement: _____

You must attach all supporting documentation required for each use of form indicated, including copies of any Legal Notices and Notices to Public Officials required by 310 CMR 40.1400.

C. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply)

Assessment and/or Monitoring Only

Removal of Contaminated Soils

Re-use, Recycling or Treatment

On Site Off Site Est. Vol.: 2500 cubic yards

Describe: oil contaminated soil reused on-site

Landfill Cover Disposal as asphalt paving Est. Vol.: _____ cubic yards

Removal of Drums, Tanks or Containers

Describe 30,000 gal steel UST removed/replaced

Removal of Other Contaminated Media

Specify Type and Volume: _____

Other Response Actions

Describe Additional investigation - soil borings/monitoring well installations

Deployment of Absorbant or Contaminant Materials

Temporary Covers or Caps

Bioremediation

Soil Vapor Extraction

Structure Venting System

Product or NAPL Recovery

Groundwater Treatment Systems

Air Sparging

Temporary Water Supplies

Temporary Evacuation or Relocation of Residents

Fencing and Sign Posting

SECTION C IS CONTINUED ON THE NEXT PAGE.



RESPONSE ACTION OUTCOME (RAO) STATEMENT &
DOWNGRADIENT PROPERTY STATUS TRANSMITTAL FORM

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C. DESCRIPTION OF RESPONSE ACTIONS: (continued)

Check here if any Response Action(s) that serve as the basis for this RAO Statement involve the use of Innovative Technologies. (DEP is interested in using this information to create an Innovative Technologies Clearinghouse.)

Describe
Technologies: _____

D. TRANSPORT OF REMEDIATION WASTE: (if Remediation Waste was sent to an off-site facility, answer the following questions)

Name of
Facility: _____

Town and
State: _____

Quantity of Remediation Waste Transported to
Date: _____

E. RESPONSE ACTION OUTCOME CLASS:

Specify the Class of Response Action Outcome that applies to the Site or Disposal Site. Select ONLY one Class:

Class A-1 RAO: Specify one of the following:

Contamination has been reduced to background levels.

A Threat of Release has been eliminated.

Class A-2 RAO: You MUST provide justification that reducing contamination to background levels is infeasible.

Class A-3 RAO: You MUST provide both an implemented Activity and Use Limitation (AUL) and justification that reducing contamination to background levels is infeasible.

If applicable, provide the earlier of the AUL expiration date or date the design life of the remedy will end: _____

Class B-1 RAO: Specify one of the following:

Contamination is consistent with background levels

Contamination is NOT consistent with background levels.

Class B-2 RAO: You MUST provide an implemented AUL.

If applicable, provide the AUL expiration date: _____

Class C RAO: Check here if you will conduct post-RAO Operation, Maintenance and Monitoring at the Site.

Specify One: Passive Operation and Maintenance

Monitoring Only

Active Operation and Maintenance (defined at 310 CMR 40.0006)

F. RESPONSE ACTION OUTCOME INFORMATION:

If an RAO Compliance Fee is required, check here to certify that the fee has been submitted. You MUST attach a photocopy of the payment.

Check here if submitting one or more AULs. You must attach an AUL Transmittal Form (BWSC-113) and a copy of each implemented AUL related to this RAO Statement. Specify the type of AUL(s) below: (required for all Class A-3 RAOs and Class B-2 RAOs)

Notice of Activity and Use Limitation

Grant of Environmental Restriction

Number of AULs attached: _____

Specify the Risk Characterization Method(s) used to achieve the RAO described above and all Soil and Groundwater Categories applicable to the Site.

More than one Soil Category and more than one Groundwater Category may apply at a Site.
Be sure to check off all APPLICABLE categories, even if more stringent soil and groundwater standards were met.

Risk Characterization Method(s) Used:

Method 1

Method 2

Method 3

Soil Category(ies) Applicable:

S-1

S-2

S-3

Groundwater Category(ies) Applicable:

GW-1

GW-2

GW-3

> When submitting any Class A-1 RAO or a Class B-1 RAO where contamination is consistent with background levels, do NOT specify Risk Characterization Method.

> When submitting any Class A-2 RAO or a Class B-1 RAO where contamination is NOT consistent with background levels, you cannot use an AUL to maintain a level of no significant risk. Therefore, you must meet S-1 Soil Standards, if using Risk Characterization Method 1.



RESPONSE ACTION OUTCOME (RAO) STATEMENT &
DOWNGRADIANT PROPERTY STATUS TRANSMITTAL FORM

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Pursuant to 310 CMR 40.0180 (Subpart B), 40.0580 (Subpart E) & 40.1056 (Subpart J)

G. DOWNGRADIANT PROPERTY STATUS SUBMITTAL:

- If a Downgradient Property Status Submittal Compliance Fee is required, check here to certify that the fee has been submitted. You MUST attach a photocopy of the payment.
- Check here if a Release(s) of Oil or Hazardous Material(s), other than that which is the subject of this submittal, has occurred at this property.

Release Tracking
Number(s): _____

Check here if the Releases identified above require further Response Actions pursuant to 310 CMR 40.0000.

Required documentation for a Downgradient Property Status Submittal includes, but is not limited to, copies of notices provided to owners and operators of both upgradient and downgradient abutting properties and of any known or suspected source properties.

H. LSP OPINION:

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and (iii) the provisions of 309 CMR 4.03(5), to the best of my knowledge, information and belief,

> if Section B indicates that a Downgradient Property Status Submittal is being provided, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in 310 CMR 40.0183(2)(b), and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B indicates that either an RAO Statement, Phase I Completion Statement and/or Periodic Review Opinion is being provided, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal.

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

Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.

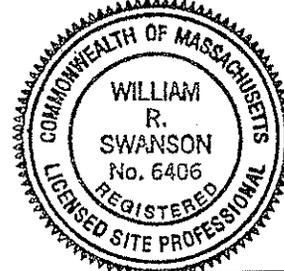
LSP Name: William R. Swanson LSP #: 6406 Stamp:

Telephone: 617-252-8458 Ext.: _____

FAX: 617-621-2565
(optional)

Signature: William R. Swanson

Date: 12/15/98



I. PERSON MAKING SUBMITTAL:

Name of Organization: Medfield State Hospital

Name of Contact: Martin Baker Title: Operations Project Manager

Street: 45 Hospital Road

City/Town: Medfield State: MA ZIP Code: 02052-0000

Telephone: 617-727-5500 Ext.: _____ FAX: _____
(optional)

J. RELATIONSHIP TO SITE OF PERSON MAKING SUBMITTAL: (check one)

RP or PRP Specify: Owner Operator Generator Transporter Other RP or PRP: _____

Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)

Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))

Any Other Person Submitting This Form Specify _____
Relationship: _____



RESPONSE ACTION OUTCOME (RAO) STATEMENT &
DOWNGRADE PROPERTY STATUS TRANSMITTAL FORM

Release Tracking
Number

Pursuant to 310 CMR 40.0180 (Subpart B), 40.0580 (Subpart E) & 40.1056 (Subpart J)

3 - 1684

K. CERTIFICATION OF PERSON SUBMITTING DOWNGRADE PROPERTY STATUS SUBMITTAL:

I, _____, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form; (ii) that, based on my inquiry of the/those individual(s) immediately responsible for obtaining the information, the material information contained herein is, to the best of my knowledge, information and belief, true, accurate and complete; (iii) that, to the best of my knowledge, information and belief, I/the person(s) or entity(ies) on whose behalf this submittal is made satisfy(ies) the criteria in 310 CMR 40.0183(2); (iv) that I/the person(s) or entity(ies) on whose behalf this submittal is made have provided notice in accordance with 310 CMR 40.0183(5); and (v) that I am fully authorized to make this attestation on behalf of the person(s) or entity(ies) legally responsible for this submittal. I/the person(s) or entity(ies) on whose behalf this submittal is made is/are aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

By: _____ Title: _____
(signature)

For _____ Date: _____
(print name of person or entity recorded in Section I)

Enter address of the person providing certification, if different from address recorded in Section I:

Street: _____
City/Town: _____ State _____ ZIP Code: _____
Telephone: _____ Ext. _____ FAX: (optional) _____

L. CERTIFICATION OF PERSON MAKING SUBMITTAL:

If you are completing only a Downgradient Property Status Submittal, you do not need to complete this section of the form.

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

By: [Signature] Title: Operations Project Mgr
(signature)

For Martin Baker Date: 12/21/95
(print name of person or entity recorded in Section I)

Enter address of the person providing certification, if different from address recorded in Section I:

Street: _____
City/Town: _____ State _____ ZIP Code: _____
Telephone: _____ Ext. _____ FAX: (optional) _____

YOU MUST COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE, AND YOU MAY INCUR ADDITIONAL COMPLIANCE FEES.

ATTACHMENT A - RESPONSE ACTION OUTCOME STATEMENT

Medfield State Hospital Power Plant Site
45 Hospital Road, Medfield, Massachusetts

Release Tracking Number - 3-1684

Camp Dresser & McKee Inc. (CDM) is providing this attachment to the Response Action Outcome (RAO) Statement Transmittal Form (BWSC-104) to meet the requirements of 310 CMR 40.0424.

CDM has reviewed the attached Licensed Site Professional Evaluation Opinion supported by Phase I Site Investigation and Tier Classification RTN 3-1684 dated May 1997 prepared by Corporate Environmental Engineering Inc. for the Massachusetts Department of Mental Health. The soil and groundwater analytical data provided in Tables 1 and 2 of the report support a finding of no significant risk and closeout of the site as a Class A-2 Response Action Outcome (RAO). The average soil Total Petroleum Hydrocarbon (TPH) concentration of 195.8 mg/kg from the 11 soil samples analyzed is less than the new Extractable Petroleum Hydrocarbon (EPH) C11 - C22 Aromatic Hydrocarbon fraction S-1/GW-2 standard of 800 m/kg. Since EPH concentrations represent a subset of TPH concentrations, TPH concentrations below the EPH standard indicate that any subset of that TPH concentration would also be below the EPH standard. EPH analysis is identified by the Massachusetts Department of Environmental Protection (DEP) guidance documents (MADEP/LSPA Spring Training Seminar - Understanding and Using the New VHP/EPH Approach) as the most appropriate indicator of the No. 6 fuel oil product reported as released at the site. The three target Polynuclear Aromatic Hydrocarbons (PAHs) analyzed for all 11 samples were also below the latest applicable MCP S-1/GW-2 standards.

The five groundwater samples analyzed from the site monitoring wells all reported TPH concentrations as Non Detects and the three target PAHs were also well below the applicable MCP GW-2 standards.

Reducing the soil and groundwater concentrations to background was not considered feasible given that the petroleum related contaminant concentrations were low in comparison to regulatory standards and the contamination was found in only two of eleven soil sample locations at significant depths below the ground surface (10 - 12 feet at B2-S2 and 19 - 21 feet at B3-S4 sample locations) and one of five groundwater monitoring well locations. The excessive cost of removing these minor levels of contamination at these isolated locations is not justified by the negligible risk of harm to human health or the environment they represent in their present location.

May, 1997

Corporate Environmental Engineering, Inc.

DEP Release Tracking Number: 3-0001684

Licensed Site Professional Evaluation Opinion Supported by
Phase I Initial Site Investigation Report and Tier Classification

EXHIBIT 3