

PUBLIC INVOLVEMENT PLAN

**2472-2484 MASSACHUSETTS AVENUE
CAMBRIDGE, MASSACHUSETTS
RTN 3-0013232**

DECEMBER 2004

(REVISED MARCH 31,2005)

PUBLIC INVOLVEMENT PLAN

**2472-2484 MASSACHUSETTS AVENUE
CAMBRIDGE, MASSACHUSETTS**

Prepared for:

VLW Realty Trust, LLC
12 Chatham Street
Cambridge, Massachusetts 02139

Prepared by:

Jacques Whitford Company, Inc.
27 Congress Street
Portsmouth, New Hampshire 03801

Text revised from a December 2004 version prepared by
MACTEC Engineering and Consulting, Inc.
107 Audubon Road
Wakefield, Massachusetts

Jacques Whitford Reference: Cambridge Best Gas/NHP05028

March 2005

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1.0 GENERAL INFORMATION

VLW Realty Trust (VLW) has requested that Jacques Whitford Company (Jacques Whitford) perform Licensed Site Professional (LSP) services to complete Response Actions at the property located at 2472-2484 Massachusetts Avenue in Cambridge, Massachusetts. The property is identified as a Disposal Site under the Massachusetts Contingency Plan (MCP) due to the presence of oil and hazardous materials in the form of residual and weathered petroleum related constituents discovered in soil and groundwater at depth between 13 and 16 feet below ground surface throughout a portion of the property.

On behalf of VLW Realty Trust, Jacques Whitford has prepared this Public Involvement Plan in accordance with the MCP (310 CMR 40.1400) to establish a process for disseminating information regarding response actions at this property and off-property as needed, and a process for public comment for consideration in those response actions.

1.1 Party

The party conducting the RAM and the current owner of the Site is:

VLW Realty Trust
12 Chatham Street
Cambridge, MA 02139
Contact: Mr. Brandon Woolkalis
617-216-2000

1.2 Site Description

The property is located at 2472-2484 (2480) Massachusetts Avenue in Cambridge Massachusetts and is situated on 11,507 square foot parcel of land identified in a commercial and residential zoned urban neighborhood (Figure 1). Until recently, the property was used as a gasoline service station. Former use of the property included a Firestone Tire store in addition to the gasoline station operations. Currently, the more than one half of the property is bare ground and the remaining portion is under construction for new building. Recent decommissioning and demolition activities have razed the former gasoline station building, removed three underground gasoline storage tanks (USTs), a gasoline pump island, concrete pads and an overhead canopy that until recently occupied a portion of the property. These removal actions were conducted under Release Abatement Measure (RAM) Plans submitted in September 2004 and November 2004. New construction is underway at the property of a commercial restaurant building and parking area.

1.3 Disposal Site History

The property was used as a gasoline service station from the 1930s until August 2004 when the property was sold to VLW Realty Trust. There were three cathodically protected, 6,000-gallon, single wall steel USTs present on-site that were formerly used to store gasoline (GES, 1995). The USTs were closed and removed in accordance with a RAM Plan (MACTEC September 2004). During the removal of a UST and one of two pump islands conducted under the above-referenced RAM, a detection of greater than 100 parts per million of total organic vapors was

measured by a field photoionization (PID) instrument 10 feet away from the outer wall of one UST and around the gas pump. This detection resulted in notification to the Massachusetts Department of Environmental Protection (MADEP) in accordance with 310 CMR 40.0313(2) and an Immediate Response Action (IRA) was initiated in accordance with 310 CMR 40.0412(2). The IRA involved the continued removal of the USTs, associated piping, the gasoline pump island, and soil that had been impacted by the release of gasoline occurring during the UST piping removal under the RAM, which triggered the notification and IRA. The conditions causing an IRA have subsequently been removed with the removal of the USTs and soils around the USTs (IRA Completion Statement – MACTEC 2004).

The subject property is Tier Classified as Tier II, and currently undergoing environmental assessment Phase II Supplemental Comprehensive Site Assessment (Phase II) and Phase III Identification and Selection of Comprehensive Remedial Action Alternatives (Phase III). The Phase III is in its initial conception pending completion of Phase II actions associated with the decommissioning of the referenced USTs. The Supplemental Phase II is being conducted to evaluate temporal and seasonal variation of the extent of groundwater contamination and the possible presence of a soil contamination source area in the location of the former USTs. This contamination does not appear to be associated with the detection of gasoline that prompted the October 2004 notification (as discussed above). The contamination appears to be associated with residual gasoline and fuel oil components for releases in the past, likely before 1985.

The referenced supplemental Phase II activities are being conducted in compliance with the MCP as a result of oil and hazardous materials (OHM) present in environmental media discovered during a site assessment conducted by Groundwater & Environmental Services, Inc., in 1995. This 1995 assessment led to notification, designation of the site as a Disposal Site (RTN # 3-0013232) by the Massachusetts Department of Environmental Protection (MADEP). In 1997 Eklund Associates classified the site as a Tier II under the MCP (Eklund, 1997). The site assessment has identified OHM in groundwater at concentrations that have decreased over time but exceed MCP appropriate standards (risk-based Method 1 standards for GW-2/GW-3 groundwater category).

1.4 Objectives of the Public Participation Plan

This Public Participation Plan (PIP) is being implemented to:

1. inform the public about the potential risks posed by the Disposal Site, status of response actions, the availability of information concerning the response actions; and
2. solicit the concerns of the Public about the Disposal Site and response actions, and consider, address and, where relevant and material to the response actions, incorporate these concerns in planning response actions.

This PIP is considered additional follow-up action undertaken by the Responsible Parties as new owners of the property to continue to provide the public with information concerning the environmental conditions at the property and immediately off the property. Information concerning these environmental conditions has been presented to the public at two separate public meetings in 2004. At these meetings, the environmental conditions at the site will be addressed to include discussion of response actions conducted in accordance with the MCP.

The environmental conditions of the property and surrounding properties with a discussion of plans.

2.0 COMPONENTS OF THE PIP

2.1 Local Concerns and Sources of Information

Actions will be taken by the Responsible Parties to provide the public with information concerning the response actions at the Disposal Site and to establish a process for receiving comments or concerns and to address those comments and concerns as appropriate to the response actions being taken. The individuals identified below are the primary sources of information exchange regarding the Disposal Site and response actions.

Two sources of information have been identified:

Responsible Party Contact

Mr. Brandon Woolkalis
12 Chatham Street
Cambridge, MA 02139
617-216-2000

Licensed Site Professional of Record

Robert Nicoloro, LSP
Jacques Whitford Company, Inc.
27 Congress Street
Portsmouth, NH 03801
(603) 431-4899

Identified to the responsible parties as representing neighborhood residents as the designated Neighborhood Representative

Mr. Michael Brandon
27 Seven Pines Street
Cambridge, MA 02140
617-864-3520

Local concerns have been raised over the potential for oil and hazardous materials (OHM) to have been released at the property and migrated off the property boundary. Concerns have been raised about the potential for off-property residents to be at risk due to a potential for OHM to migrate off the property. Concerns have been raised regarding the possibility of a stigma of "contaminated property" being attached to off-site properties due to the presence of OHM on or beneath off-site properties, if such a condition exists. Concerns have been raised regarding the ability and desire of the new property owners to cleanup the subject property and to address off-site properties if necessary. These concerns have been discussed in previous public meetings.

2.2 Methods of Informing the Public

Information regarding response actions at the Disposal Site will be made available, following approval of this draft PIP, by the Responsible Parties establishing a document repository in the Cambridge Main Public Library located at:

O'Neill Branch Library

(617) -349-4023

Address: 70 Rindge Ave
Cambridge, MA 02140

Hours:

Mon-Fri 9am-9pm
Sat 9am-5pm
Sun 1pm-5pm

Copies of reports are available through written request to:

VLW Realty Trust

Brandon Woolkalis

12 Chatham Road

Cambridge, MA. 02139

A copying charge may be applied to requests for multiple copies

Copies of reports are also available for viewing by appointment at the:

Massachusetts Department of Environmental Protection

DEP Northeast Region File Review Center

c/o Dept of Transitional Assistance

Shetland Park, 35 Congress Street

Salem, MA 01970

Telephone: 978-740-0809

Fax: 978-740-0808.

email: nero.service@state.ma.us

General Principals for Public Involvement as detailed in the MCP (310 CMR 40.1400) also apply to the response actions taken at the Disposal Site. Therefore, copies of reports and notifications that occur following the approval of this PIP will be submitted to the Chief Municipal Office for the City of Cambridge:

Mayor's Office

Cambridge City Hall

2nd Floor

795 Massachusetts Avenue

Cambridge, MA 02139

Phone: (617) 349-4321;

P:\Best Gas Cambridge\PIP\PIP.doc

and to the Public Health Department for the City of Cambridge

Cambridge Public Health Department

119 Windsor Street,
Ground Level
Cambridge, MA 02139
Tel: 617.665.3800.

The most recent reports submitted for this Disposal Site prior to this PIP are on file with the:

Massachusetts Department of Environmental Protection

One Winter Street
Boston, MA 02110

These reports will remain at the Boston location until such time they are transferred to the Salem, MA document file location. The timing for this transfer is determined by the Site Project Manager for the Massachusetts Department of Environmental Protection.

A notice of availability of key documents, milestones response actions or other public involvement activities that occur following approval of this PIP will be sent to:

Neighborhood Representative
Mr. Michael Brandon
27 Seven Pines Street
Cambridge, MA 02139
617-864-3520

2.3 Opportunities to Comment

Other than comments received verbally during the December 2004 public meeting, no other comments have been received as of the date of this revision of the draft PIP. The response actions being conducted at this Disposal Site are entering the completion phase for the Site Assessment. Following this Site Assessment Phase will be the identification of Remedial Action Alternatives if such Remedial Actions are warranted following the completion of the Site Assessment, and/or a Response Action Outcome stating that a condition of No Significant Risk has been achieved in accordance with the MCP. The Public had the opportunity to hear about and discuss the scope of the remaining Site Assessment actions planned for the near future at the PIP introduction meeting (December 28, 2004) and subsequent meetings as needed. The Public will also have an opportunity to comment on the following future documents to be submitted to the Massachusetts Department of Environmental Protection:

- Construction RAM – Submitted to DEP in November 2004;
- Supplemental Phase II Comprehensive Site Assessment Groundwater Sampling Work Plan;
- Supplemental Phase II Comprehensive Site Assessment Report;

- Phase III Identification, Evaluation and Selection of a Remedial Action Alternative Completion Statement;
- Construction Release Abatement Measure Completion Statement;
- Other subsequent phases of activities conducted in accordance with the MCP, as needed; and
- Response Action Outcome Statement.

Opportunities to comment on the response actions are provided through a minimum 20-day comment period [310 CMR 40.1405 (6)(e)]. The comment period may be extended, if requested, for a minimum of an additional 20 days. The comment period shall begin one day following the submittal date of the document as identified on the document. A request for an extension must be received no later than 7 days before the end of the scheduled comment period.

In accordance with the MCP, Phase II Scopes of Work shall be subject to additional comment periods if significant changes are proposed, which substantially alter or expand the Scope of Work. Comments on Immediate Response Actions may be reduced or eliminated by the Massachusetts Department of Environmental Protection if it would delay the timely implementation of the remedial action. The comment periods on Release Abatement Measures shall be ten days and comments shall be simultaneously submitted to the Massachusetts Department of Environmental Protection by VLW Realty Trust. Comment periods for reports concerning inspection and monitoring of remedial actions and status report, if such actions are conducted, are not required by the MCP unless specifically requested by the Public.

2.4 Consideration of Public Comments

Comments received in writing or from public information meetings concerning the response actions being conducted at the Disposal Site will be evaluated by VLW Realty Trust. A comment receipt log will be created to record the comments received in writing. Written minutes of any scheduled public meeting will be taken and made available through the process described above.

Following evaluation of public comments received within the designated comment periods, VLW Realty Trust will issue a response to those comments and indicate whether those comments have resulted in changes to the documents that are subject to the comments. A complete listing of comments and responses will be provided as an appendix to each relevant submittal to Massachusetts Department of Environmental Protection. Public comments regarding the Disposal Site received during the comment period are considered, and where relevant and material to the response action, incorporated into the decisions regarding response actions. A summary will be prepared of all Public comments received during any comment period, and that summary will contain the comments received, noting which comments have been incorporated and providing an explanation of why others have not.

2.5 Schedule of Public Involvement Activities

There is no planned Public Involvement Activities scheduled with the exception of the PIP meeting conducted on December 28, 2004, an update meeting scheduled for April 2005 and continued submittals of documents to the library repository and others upon request. In the event it becomes necessary to schedule additional activities to include meeting, VLW Realty Trust will provide notice, a meeting location, and any supporting documentation for the subject of the meeting at the meeting upon arrival. Notice of additional Public Involvement Activities or meeting schedules will be made by VLW Realty Trust through the Neighborhood Representative or City Official, as needed.

The schedule for the issuance of the documents identified in Section 2.3 of this PIP has not yet been confirmed. However, once a document submittal date is scheduled, notification will be made to the Neighborhood Representative of that date and the start date of the Public Comment Period.

2.6 Mailing List

VLW Realty Trust will maintain a mailing list of individuals who ask to receive information about the Disposal Site. This mailing list will be available to only the Neighborhood Representative, City of Cambridge Officials and the Massachusetts Department of Environmental Protection upon request. This mailing list will be maintained in the project files with VLW Realty Trust and the Licensed Site Professional of Record.

2.7 Acceptance and Modifications to the PIP

This PIP is issued for public comment on December 28, 2004. The public comment period for this PIP will be open until January 20, 2005 unless additional time is requested in writing received no later than 7 days before the scheduled end of the comment period. Comments to this PIP received on December 28 have been incorporated into this revised PIP as appropriate (Appendix A). Comments should focus on the purpose, objectives, and processes summarized in this Plan. Comments regarding the environmental conditions at the site should be submitted under a separate cover.

Upon receiving no comments on this PIP, or upon resolving questions or comments on this PIP, the PIP will be issued as final. Comments received that are relevant and material to this PIP and the processes herein will be incorporated into the final PIP. An explanation of why other comments are not incorporated into the PIP will be provided in a Public Comment summary included in the final PIP as an appendix to that document.

In the event that the PIP requires modification or revising, VLW Realty Trust will issue revised text to the draft PIP along with an explanation for the revisions. These revisions will be submitted to those on the established mailing list. It is not the responsibility of VLW Realty Trust to maintain a complete PIP document for the parties on the mailing list. A complete

document inclusive of revisions and modifications will be available at the repository and locations identified in Section 2.2.

The attached last page of the PIP (Appendix B) is an acceptance form. Signing in space provided will identify that you are in agreement with this PIP and the processes therein. Failure to provide this signature page during the comment period, and where no comments are received from you within this period, will be viewed as your acceptance of this draft PIP. The draft PIP will then be finalized.

Acceptance of this PIP can be accomplished by signing and returning the signature page on or before the end of the Public Comment Period for this revised draft PIP (April 25, 2005) provided no extensions are requested. Please remit this signature page to:

VLW Realty Trust

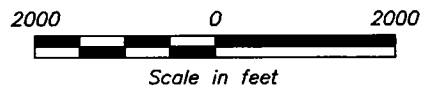
Brandon Woolkalis
12 Chatham Road
Cambridge, MA. 02139

FIGURES

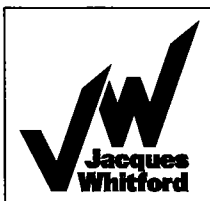


MAP SOURCE:

TOPOZONE.COM
 BOSTON NORTH, MA
 1991



Jacques Whitford Company, Inc.



JACQUES WHITFORD LOCATION:
 PORTSMOUTH, NEW HAMPSHIRE

DRAWING TITLE:

SITE LOCATION MAP

2480 MASSACHUSETTS AVENUE
 CAMBRIDGE, MASSACHUSETTS

| | | | | |
|----------------------------|--------------------|-----------------|-------------------|---------------------|
| DATE PREPARED: 03-22-05 | DESIGNED BY: LS | DRAWN BY: TS | CHECKED BY: LS | REVIEWED BY: RHA |
| REVISION DATE: | REVISION NO.: | DRAWN BY: | CHECKED BY: | REVIEWED BY: |

| | | |
|---------------------------------------------------------|-------------------------------------|-------------------|
| PROJECT NAME/FILE NAME: FORMER BEST GAS STATION/SITE | PROJECT NUMBER/PHASE: NHPO5028/1 | SCALE: 1:24000 |
|---------------------------------------------------------|-------------------------------------|-------------------|

PREPARED FOR:
 VLW REALTY TRUST

FIGURE NO.

1

APPENDIX A

DECEMBER 28TH PIP MEETING MINUTES

December 28th Pip meeting minutes

Start time 715pm

Mr. Nicoloro gives background on site and Pip Plan
The Pip meeting is a MCP requirement

Discussion on information dissemination and public comment provisions

Question. If any future meetings are made could they be closer to the site?

Question. Was there notice place in a paper.... Yes in the chronicle as per
DEP regulations

Mr. Nicoloro reviews the plan and petitioners comment

Request that document repository be changed to 70 Rindge Ave
Library...Agreed

Mr. Nicoloro states he will send Mr. Brandon the representative for the
petitioners, the Library, the public health office and the public official a copy
of the forth coming documents.

Question of older documents... can they have copies....yes you can get the
at Salem or in Boston.

5 Phases of MCP explained

Mr. Brandon wants to comment on 2 previous rams...and it is explained that
these have already been submitted to MCP

Mr. Nicoloro states that after approval of the PIP then all documents after
that can be commented on

Previous documents to be put in repository as required by MCP

All responses shall be fed through Mr. Brandon

All comments will be logged with time received

Mr. Brandon asks if there is possibility to add people to mailing list...

Mr. Nicoloro notes that Zoning and licensing meetings have discussed all actions taken

Mr. Brandon wants transcripts from these meetings...Mr. Woolkalis states these are available from the City of Cambridge at a cost.

Mr. Nicoloro states that all documents talk about the history of the city

Jan 20th as the day set for the date comments needed by

Mr. Brandon asks about a web site

Speaker asks if a Pip Plan can be sent to the other petitioners...Mr. Woolkalis....yes if they request it

End of meeting 8:40pm

Role Call

1 Carolyn Mieth 15 Brookford St 617-864-6751

2 Dick Clarey Same

3 Michael Nakagawa 51 Madison Ave 617-876-3738

4 Michael Brandon 27 Seven Pines 617-864-3520

5 Craig Kelly 6 Saint Gerard Terr. 617-354-8357

APPENDIX B

PUBLIC INVOLVEMENT PLAN (PIP) ACCEPTANCE STATEMENT

PUBLIC INVOLVEMENT PLAN (PIP) ACCEPTANCE STATEMENT

By signing in the space provided below you are signifying that you are in agreement with this PIP and the processes therein. Failure to provide this signature page during the comment period, and where no comments are received from you within this period, will be viewed as your acceptance of this PIP.

Return Only This Completed Page to:

VLW Realty Trust

Brandon Woolkalis

10 Chatham Road

Cambridge, MA. 02139

By January 20, 2005

Signature

Date

Please Print Name

Street Address

Telephone Number