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The Commonwealth of Massachusetts

Executive Office for Administration and Finance
Division of Capital Asset Management
One Ashburton Place
Boston, Massachusetts 02108
Tel: (617) 727-4050
Fax: (617) 727-5363

MITT ROMNEY
GOVERNOR

KERRY HEALEY
LIEUTENANT GOVERNOR

ERIC A. KRISS
SECRETARY, ADMINISTRATION & FINANCE

DAVID B. PERINI
COMMISSIONER

July 28, 2003

United States Environmental Protection Agency
Municipal Assistance Unit (CMU)
One Congress Street, Suite 1100
Boston, MA 02114-2023

JUL 31 2003
MUNICIPAL ASSISTANCE UNIT

Massachusetts Department of Environmental Protection
Division of Watershed Management
627 Main Street, 2nd Floor
Worcester, MA 01608

Massachusetts Department of Environmental Protection
PO Box 4062
Boston, MA 02211

RE: Request for Permit Coverage: June 2003
National Pollutant Elimination Discharge System (NPDES) General Permit for Storm Water Discharges from a Small Municipal Separate Storm Sewer System (MS4)
Division of Capital Asset Management (DCAM) Surplus Properties
Grafton Complex NOI Letter

To Whom It May Concern:

In order to comply with the NPDES Phase II Storm Water regulations, the Division of Capital Asset Management (DCAM) enlisted the services of Malcolm Pirnie, Inc. (MPI) to conduct site assessments at selected DCAM surplus properties to assess each property's potential for storm water pollution and to gather information. Based on the assessment of each property, and review of the final Phase II NPDES storm water permit requirements, a preliminary determination was made whether a property should submit a Notice of Intent (NOI) or waiver letter. This letter concerns the Grafton Complex (Property) located in the towns of Grafton, Shrewsbury, and Westborough, Massachusetts. Based on an assessment completed by MPI, and review by DCAM, it was concluded that the Phase II NPDES storm water requirements should apply to this site. Thus this letter that includes the NOI and Transmittal Form for Permit Application and

Payment is submitted for your consideration. The site assessment letter report is attached as Appendix A to provide information justifying the necessity of the permit request.

The following information has been completed for the NOI:

- Applicant information
- Names of presently known receiving waters
- Storm water management summary
- Certification
- Storm water management program time frames

Section B, Item 5 of the NOI has been checked as "yes" for "listed species" and critical habitat. A formal letter (Appendix A, Attachment D) received from the Massachusetts Natural Heritage and Endangered Species Program (NHESP) states that the Property abuts priority/estimated habitat for "Special Concern" species listed by Massachusetts, but not by the U.S. Fish and Wildlife.

Section B, Item 6 of the NOI has been checked as "Pending" for historic properties because the Massachusetts Historical Commission (MHC) has not yet responded as to whether historic sites are affected by the Property.

If you have any questions or require any additional information, please do not hesitate to contact me at 617-727-4030.

Very truly yours,

DCAM

Mark Roberts, P.E.
Project Manager

cc: Robert Winn, Malcolm Pirnie
MADEP, Division of Watershed Management
MADEP, w/ Transmittal Form only

Hand-enter Your Transmittal Number → **W 036168**

Your unique Transmittal Number can be accessed through DEP's web site or by calling the DEP InfoLine as listed on the last page of this document

Massachusetts Department of Environmental Protection
Transmittal Form for Permit Application and Payment

Instructions

1. Please type or print. A separate Transmittal Form must be completed for each permit application.

2. Your check should be made payable to the Commonwealth of Massachusetts. Please mail your check along with a copy of this form to: DEP, P.O. Box 4062, Boston, MA 02211.

3. Three (3) copies of this form will be needed.

Copy 1 (the original) must accompany your permit application. **Copy 2** must accompany your fee payment. **Copy 3** should be retained for your records

4. Both fee-paying and exempt applicants must mail a copy of this transmittal form to DEP, P.O. Box 4062, Boston, MA 02211

For DEP Use Only
Permit No._____
Rec'd Date_____
Reviewer_____

A. Application Information

DEP Permit Code (the 7 or 8 character code from first page of permit application instructions): BRPWM08A
Name of Permit Category: NPDES Stormwater General Permit
Type of Project or Activity: Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)

B. Applicant Information (Firm or Individual)

Name of Firm: Division of Capital Asset Management			
Or, if party needing this approval is clearly an individual:			
Individual's Last Name:	First Name		MI
Street Address: One Ashburton Place, 15th Floor			
City/Town: Boston	State: MA	Zip Code: 02108	Telephone Number: (617) 727-4030 ext.
Contact: Michael McKimmey, P.E., Deputy Commissioner	e-mail address (optional)		

C. Facility, Site or Individual Requiring Approval

Name of Facility, Site or Individual: Grafton Complex			DEP Facility Number (if Known)
Street Address: Route 30			e-mail address: (optional)
City/Town: Grafton	State: MA	Zip Code: 01519	Telephone Number: ( ) ext.

D. Application Prepared by (if different from Section B)

Name of Individual or Firm: Malcolm Pirnie, Inc.			
Address: 500 Edgewater Drive, Suite 566			
City/Town: Wakefield	State: MA	Zip Code: 01880	Telephone Number: (781) 224-4488 ext.
Contact: Robert Winn, P.E.	LSP Number (21E only)		

E. Permit - Project Coordination

Is this project subject to MEPA review? ☐ yes ☒ no
If yes, indicate the project's EOEA file number (assigned when an Environmental Notification Form is submitted to the MEPA unit)
EOEA # Is an Environmental Impact Report Required? ☐ yes ☒ no
Is this application part of a larger project for which two or more DEP permits are being or will be sought? ☐ yes ☒ no
List any other DEP permits that apply to this project:

Permit Category	**Date of Submission** (tentative or actual)	**Transmittal Number** (if application already submitted)

F. Amount Due

Special Provisions:
☒ Fee Exempt* (city, town or municipal housing authority)(state agency if fee is $100 or less)
☐ Hardship Request [payment extensions according to 310 CMR 4.04(3)(c)]
☐ Alternative Schedule Project (according to 310 CMR 4.05 and 4.10)
*There are no fee exemptions for 21E, regardless of applicant status

Check #:	Dollar Amount:	Date:
Please make check payable to the Commonwealth of Massachusetts and mail check and one copy of this form to DEP, P.O. Box 4062, Boston, MA 02211		

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Watershed Management

BRP WM 08A NPDES Stormwater General Permit

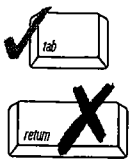
Notice of Intent for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)

W036168
Transmittal Number

Facility ID (if known)

A. Instructions

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.



Submission of this Notice of Intent constitutes notice that the entity named at item B1. of this form intends to be authorized by the DEP General Permit issued jointly with EPA for stormwater discharges from the small municipal separate storm sewer system (MS4), in the location identified at item B2. of this form. Submission of the Notice of Intent also constitutes notice that the party identified at item B1. has read, understands and meets the eligibility conditions of Part I.B. of the NPDES Small MS4 General Permit, agrees to comply with all applicable terms and conditions of the NPDES Small MS4 General Permit, and understands that continued authorization to discharge is contingent on maintaining eligibility for coverage. **In order to be granted coverage, all information required on BRP WM 08A, including the Stormwater Management Program Summary and Time Frames form, must be completed. Please read the permit and make sure you comply with all requirements, including the requirement to develop and implement a stormwater management program.**

B. Applicant Information

1. Small MS4 Operator/Owner Information:

   Michael McKimmey, P.E., Division of Capital Asset Management
   Name

   One Ashburton Place, 15th Floor
   Mailing Address

   Boston
   City/Town

   Massachusetts
   State

   (617) 727-4030
   Telephone Number

   Email (if available)

2. Municipality Name

   The Commonwealth of Massachusetts, Division of Capital Asset Management: Grafton Complex.
   City/Town

3. Legal Status:

   ☐ Federal ☐ City/Town ☒ State ☐ Tribal ☐ Private

   ☐ Other public entity:
   Specify Public Entity

4. Other regulated MS4(s) within municipal boundaries:

   Not Applicable

5. Based on the instructions provided in Part I of the NPDES Small MS4 General Permit, have the eligibility criteria for "listed species" and critical habitat been met?

   ☒ yes ☐ pending ☐ no

B. Applicant Information (cont.)

6. Based on the instructions provided in Part I of the NPDES Small MS4 General Permit, have the eligibility criteria for protection of historic properties been met?

☐ yes ☒ pending ☐ no

Note: Section C may be duplicated to accommodate a larger list of receiving waters

C. Names of (Presently Known) Receiving Waters

Receiving Water:	No. of Outfalls	Listed as Impaired?	Impairment
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
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Name	Number	☐ Yes ☐ No	Specify
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Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify
Name	Number	☐ Yes ☐ No	Specify

D. Stormwater Management Program Summary

1. Public Education:

BMP ID #	Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
1A	Education for commercial activities.	Mark Roberts	Number of education materials distributed.

2. Public Participation:

BMP ID #	Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
N/A	Not Applicable	Not Applicable	Not Applicable

D. Stormwater Management Program Summary (Cont.)

3. Illicit Discharge Detection and Elimination:

BMP ID #	Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
3A	Conduct dry weather sampling of outfalls.	Mark Roberts	Based on results, determine if outfalls are polluted.
3B	If outfalls are polluted, determine the source.	Mark Roberts	Identify outfalls' tributaries and investigate drainage system.
3C	If outfalls are polluted, eliminate the sources.	Mark Roberts	Resample outfalls to verify polluted sources are removed.

4. Construction Site Runoff Control:

BMP ID #	Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
N/A	Not Applicable	Not Applicable	Not Applicable

D. Stormwater Management Program Summary (Cont.)

5. Post Construction Runoff Control:

BMP ID #	Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
N/A	Not Applicable	Not Applicable	Not Applicable

6. Municipal Good Housekeeping:

BMP ID #	Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
6A	Employee training.	Mark Roberts	Number of employees trained.
6B	Standard Operating Procedures.	Mark Roberts	Number of procedures developed.

D. Stormwater Management Program Summary (cont.)

7. BMPs for Meeting TMDL:

N/A
BMP ID #

Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
Not Applicable	Not Applicable	Not Applicable
BMP ID #		
Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
BMP ID #		
Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
BMP ID #		
Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal
BMP ID #		
Specify Best Management Practice	Responsible Dept./Person Name	Specify Measurable Goal

E. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Kenneth M. Tilden, Deputy Director
Printed Name

Kenneth M. Tilden
Signature

7/28/03
Date

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Watershed Management

BRP WM 08A NPDES Stormwater General Permit Notice of Intent for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)

F. Storm Water Management Program TIME FRAMES

Transmittal Number W036168

Facility ID (if known)

	PERMIT YEAR ONE				PERMIT YEAR TWO				PERMIT YEAR THREE				PERMIT YEAR FOUR				PERMIT YEAR FIVE				
BMP ID #	Spring 03	Summer 03	Fall 03	Winter 03-04	Spring 04	Summer 04	Fall 04	Winter 04-05	Spring 05	Summer 05	Fall 05	Winter 05-06	Spring 06	Summer 06	Fall 06	Winter 06-07	Spring 07	Summer 07	Fall 07	Winter 07-08	Next Permit
1A			X																		
3A			X																		
3B					—	—															
3C									—	—											
6A			X																		
6B			X																		

APPENDIX A
Assessment Letter Report

July 25, 2003

Mr. Mark Roberts
Project Manager
Division of Capital Asset Management
One Ashburton Place, 15th Floor
Boston, MA 02108

RE: Division of Capital Asset Management (DCAM) Surplus Properties
Grafton Complex Assessment Letter Report

Dear Mr. Roberts:

In accordance with our February 5, 2003 proposal, Malcolm Pirnie, Inc. (MPI) has completed a site assessment at the Grafton Complex (Property) to determine if the Property is required to meet the National Pollutant Discharge Elimination System (NPDES) Phase II Storm Water regulations. The Property is located in Grafton, Shrewsbury, and Westborough, Massachusetts. A site assessment consisting of two site visits was conducted on February 28, 2003 and May 20, 2003.

The following sections describe the type of information documented during the assessment, visual observations made during our site visits, and conclusions based on our assessment. The Division of Capital Asset Management (DCAM) provided maps of the Property that show the existing features and the number of buildings. DCAM also provided a knowledgeable person to assist during our site assessment.

A. Assessment Data

The site assessment focused on the storm water conveyance system, potential storm water pollution issues, and any observed outfalls and discharges. Prior to each Property site visit, an assessment was completed to identify drainage piping based on available mapping, nearby waterbodies, waterbodies on the Massachusetts 303(d) List of Impaired Waters, waterbodies on the Massachusetts Year 2002 Integrated List of Waters, threatened or endangered species, and historic sites on or near the Property.

The following information was documented:

- Storm Water Assessment
  - Site description

- Property description
- Site activity
- Buildings on site
- Based on available mapping, the location of:
  - Buildings
  - Outfalls
  - Drainage directions
  - Nearby waterbodies
  - Noticeable pollution issues
  - Drainage piping and structures that discharge offsite
- Visible Observations
- Waterbodies on the Massachusetts 303(d) List of Waters
- Waterbodies on the Massachusetts Year 2002 Integrated List of Waters
- Visible pollution issues
- Potential pollution issues
- Other observations

- Outfall Assessment
  - Pipe type and size
  - Evidence of flow
  - Visual inspection of flow (i.e., color, odor, turbidity, structural damage, and presence/absence of oil)
  - Estimated flow depth
  - Presence of standing water
  - Visual inspection of standing water (i.e., color, odor, turbidity, structural damage, and presence/absence of oil)
  - Unusual piping or ditches

Attachment A includes the Outfall Assessment Sheets for conducting outfall assessments. The sheet has been completed for nine outfalls designated as Outfall #1, Outfall #2, Outfall #3, Outfall #4, Outfall #5, Outfall #6, Outfall #7, Outfall #8, and Outfall #9.

B. Assessment Observations

The site maps provided by DCAM were used as a guide to conduct the assessment. Attachment B includes Figure 1 that shows the extent of the Property, land cover types, and building groups within the Property. The Property consists of three groups of buildings—Oaks Group, Pines Group, and Willows Group. In addition, a wooded area north and northwest of Oaks Group contains three homes and a cottage. Figure 2 shows buildings, outfalls, and land cover types for the Oaks Group and wooded area. Figure 3 shows buildings and land cover types for the Pines and Willows Groups. Attachment C includes photographs taken during the site visits. Selected photographs are referenced in this report.

The Property consists of 20 buildings and various access roadways and parking lots. Oak Group is used by the Department of Youth Services (DYS) and the Pines and Willows Groups are used

by the Grafton Job Corps Center. The wooded area contains homes used by Intermediate Care Facility/Mental Retardation (ICF/MF) and a cottage used by Environmental Police for office storage. The main entrance to Oaks Group is Route 30 and the main entrance to the Pines and Willows Groups is Green Street. The following buildings are on the Property (occupants and building use are given for each building):

- **Oaks Group**
- Barn
  - Occupant: DYS
  - Building use: maintenance equipment and vehicle storage and sand/salt storage

- A-Building
  - Occupant: DYS
  - Building use: home for children

- B-Building
  - Occupant: DMH
  - Building use: office

- C-Building
  - Occupant: DCAM
  - Building use: vacant

- D-Building
  - Occupant: DYS
  - Building use: home for children

- Service Building
  - Occupant: DCAM
  - Building use: vacant

- Heating Plant
  - Occupant: DCAM
  - Building use: vacant

- Cottage
  - Occupant: DYS
  - Building use: home for children

- **Pines Group**
- A-Building
  - Occupant: Job Corp
  - Building use: school building

- B-Building
  - Occupant: Job Corp
  - Building use: school building

- C-Building
  - Occupant: Job Corp
  - Building use: school building

- D-Building
  - Occupant: Job Corp
  - Building use: school building

- E-Building
  - Occupant: Job Corp
  - Building use: school building

- Laundry and Power Plant building
  - Occupant: Job Corp
  - Building use: equipment maintenance and storage

- Carpenter Shop
  - Occupant: Job Corp
  - Building use: school building

- Nurses Building
  - Occupant: Job Corp
  - Building use: school building

- **Willows Group**
- A-Building
  - Occupant: Job Corp
  - Building use: school building

- B-Building
  - Occupant: Job Corp
  - Building use: school building

- **Wooded Area**
- (3) Homes
  - Occupant: ICF/MF
  - Building use: home for children

- Cottage
  - Occupant: Environmental Police
  - Building use: office storage

Within the Property, the area consists of impervious surfaces occupied by the buildings, access roadways, and parking lots. All roadways are plowed to allow access on the Property. If needed, the roadways are sanded with a sand/salt mixture that contains six percent salt. The sand/salt mixture is kept in a covered shed attached to the Barn building in the Oaks Group (Attachment C, Figure 1-12). Based on recent years, the Property is sanded an average of three to five times per year. Large areas of pervious surface surround the buildings as open fields and wooded areas (Attachment C, Figures 2-5, 2-9, 2-13, and 2-18). Pervious surfaces also include lawn areas around the immediate vicinity of the buildings (Attachment C, Figure 2-8).

Based on available mapping and a visual assessment, it does not appear that storm water drainage pollution should be an issue on the Property. Outfalls are located in the Oaks, Willow, and Pines Groups. Storm water from Oaks Group drains to five outfalls (Outfalls #1, #2, #3, #4, and #5). Outfall #1 (Attachment C, Figure 1-1) is a 12-inch polyvinyl chloride (PVC) pipe that accepts runoff from two catch basins located in a parking lot and an access roadway north of the Cottage. Outfall #1 drains to an open field northeast of the cottage (Attachment C, Figure 1-2). Outfall #2 (Attachment C, Figures 1-5 and 2-20) is an 8-inch clay pipe that drains roof runoff from B-Building to an open field east of B-Building. Outfalls #3 (Attachment C, Figure 2-15) is a box culvert that drains runoff from the access roadway located near the Service Building. Outfall #4 (Attachment C, Figure 2-17) is an 8-inch clay pipe that also drains runoff from the access roadway. Outfall #5 is a caved-in outfall that drains runoff from a small section of the wooded area that tends to pond during rain events. Outfall #5 (Attachment C, Figure 2-19) drains across the access roadway to a wooded area (Attachment C, Figure 1-13). At the time of the assessment, Outfalls #1, 2, 4, and 5 did not have dry weather discharge. Outfall #3 did have dry weather discharge. The discharge was odorless, colorless, and did not contain garbage or sewage.

Storm water from Willows Group drains to three outfalls (Outfalls #6 and #8). Outfall #6 (Attachment C, Figures 1-30 and 2-1) is an 8-inch clay pipe located east of A-Building in the Pines Group and drains toward a wooded area east of Pines Group (Attachment C, Figure 2-2). Outfall #8 (Attachment C, Figure 2-4) is a 12-inch concrete pipe that accepts runoff from the access roadway near the Service building. At the time of the assessment, Outfalls #6 and #8 did not have dry weather discharge.

Storm water from Pines Group drains to three outfalls (Outfalls #7 and #9). Outfall #7 (Attachment C, Figure 2-3) is a concrete pipe (unable to determine diameter due to debris) that accepts runoff from catch basins located the Power Plant. At the time of the assessment, Outfall #7 did not have dry weather discharge. Outfall #9 is an 8-inch clay pipe (Attachment C, Figure 2-6). During the assessment, dry weather discharge was flowing from the outfall. The discharge was odorless, colorless, and did not contain garbage or sewage. Attachment A includes the Outfall Assessment Sheets and Attachment B (Figures 2 and 3) shows the location of all the

outfalls.

During our site visit, dumpsters located in the Oaks Group, Pines Group, and ICF/MF home were covered and not exposed to precipitation (Attachment C, Figures 1-3, 1-16, and 2-11). The Property contains the following aboveground storage tanks (ASTs) located in the Oaks Group that are fenced in and placed on concrete pads. These ASTs showed no evidence of leakage and have secondary containment to prevent leakages:

- (2) Propane tanks used for B-Building (Attachment C, Figure 1-4).
- (2) Propane tanks used for D-Building (Attachment C, Figure 1-6).
- (2) Propane tanks used for Cottage (Attachment C, Figure 2-14).

A landfill is located east of the Laundry and Power Plant within a field (Attachment C, Figure 2-10). The landfill did not show evidence of pollution runoff. However, the need for an industrial discharge permit under the NPDES Phase I Storm Water Program should be investigated for the landfill.

The Property is located within the Blackstone and Concord Watersheds. The closest waterbody, the Axtell Brook, is located east of the Oaks Group (Attachment B, Figure 2). It is not listed in the Massachusetts 2002 Integrated List of Waters. In addition, an unnamed pond on the Property, located northwest of the Willows Group, discharges south across Green Street (Attachment C, Figure 1-29) and then east into wetlands located on the Property.

The U.S. Fish and Wildlife list of endangered and threatened species as well as the Environmental Protection Agency's (EPA's) Endangered and Threatened Species County List for Massachusetts were used to verify whether endangered or threatened species are located near the Property. These species lists were compared to information from the Massachusetts Natural Heritage and Endangered Species Program (NHESP). The "NHESP 1999-2001 Estimated Habitats for Rare Wildlife: For Use with the Massachusetts Wetlands Protection Act Regulations (310 CMR 10)", "NHESP 1999-2001 Priority Habitats for State-Protected Rare Species: Not Equivalent to 'Significant Habitat' as designated under Massachusetts Endangered Species Act", and the "NHESP BioMap Core Habitat" Geographic Information System (GIS) datalayers were used to identify whether the Property was within an area of rare wildlife. Based on the most current information available, it was determined that the Property is located within habitats of state-protected rare wildlife that live in wetland areas and places of known habitats for rare species that have been documented within the last 25 years. A formal letter, with a Rare Species Information Request Form, was sent to the NHESP to verify that rare species exist in the vicinity of the Property (Attachment D). The NHESP responded with a letter that stated priority/estimated habitat for "Special Concern" species including the Blue-Spotted Salamander, Spotted Turtle, and Wood Turtle are located on and near the Property (Attachment D). "Special Concern" species include those that have suffered a decline in recent years and, if continue to do so, will be listed as threatened species. However, no species listed by the U.S. Fish and Wildlife are located within the vicinity of the Property.

The Property is considered to be a historic site. The Massachusetts Historical Commission (MHC) "State Register of Historic Places 2002" and "National Register of Historic Places"

designates the Property as historical under the National Register: Determination of Eligibility (NRDOE) and National Register Multiple Property Submission (NRMPS). It was designated as a historical property of Grafton in 1994. A formal letter, with a Project Notification Form, was sent to the MHC to verify that historic resources are not being affected by the Property (Attachment D). MHC has not yet replied. However, since construction projects including demolition, rehabilitation, and new construction are not current activities at the Property, the MHC will most likely determine that significant historic and archaeological resources are not affected. In addition, there are no outfalls located on the Property that could directly affect historic sites.

C. Conclusions

Based on our assessment and the final EPA/Massachusetts Department of Environmental Protection (MADEP) Storm Water Phase II municipal separate storm sewer system (MS4) NPDES requirements, we have concluded that DCAM should submit a Notice of Intent (NOI) for the Property. The NOI should be submitted to the EPA and MADEP.

The following reasons justify the recommendation of a NOI for the Property:

- Property is active with 20 buildings on site.
- Maintenance activities (vehicle, equipment, and sand/salt storage) occur on the Property.
- Outfall #9 had dry weather discharge.

If you have any questions or require any additional information, please do not hesitate to contact me at 781-213-4912.
Very truly yours,

MALCOLM PIRNIE, INC.

Robert S. Winn, P.E.
Associate

cc: W. Di Tullio, Vice President, MPI
Peter Wilson, Associate General Counsel, DCAM
File 4732002-C

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ATTACHMENT A
Outfall Assessment Sheet

NOI (PHASE II ASSESSMENT) FOR DCAM **PROPERTY** Grafton Complex

CHECKLIST FOR CONDUCTING OUTFALL ASSESSMENTS

1. Date of assessment: 2/28/03 and May 20, 2003
2. Outfall I.D. Outfall #1
3. Date of last rain/snow event: 2/23/03 (rain) 5/14/03 (rain)
4. Photographs: Attachment C, Figure 1-1
5. Assessor's name: Bridget Zwack
6. Weather & Temp: 2/28/03: Cloudy, 30°F 5/20/03: Sunny, 70°F
7. Type of outfall

☐ Concrete ☐ Pipe ☐ Grassed ☐ Rock ☒ Other PVC

8. Size of outfall Width_____ Height _____ Diameter 12"
9. Is there visible flow from the pipe? ☐ Yes ☒ No

If yes, check all that apply. If no, go to number 11.

☐ Colored water (describe)
☐ Oily sheen
☐ Odor (describe- sewage, sulfide, oil, gas, etc.)
☐ Sludge present
☐ Murky
☐ Turbidity (describe- cloudy, opaque, etc.)
☐ Floating objects (describe- floatables, oil sheen, sewage, etc.)
☐ Stains on conveyance (describe- sediment, oily, etc.)
☐ Absence of plant life surrounding conveyance
☐ Notable difference in plant life surrounding conveyance
☐ Scum
☐ Suds ☐ Other: _____

e.g., rotten eggs, earthy, chemical, chlorine, soap, putrescence, gasoline, musty, etc.

10. Estimated flow depth _____
11. Is there standing water present? ☐ Yes ☒ No

If yes, check all that apply. If no, go to number 12.

☐ Colored water (describe)
☐ Oily sheen
☐ Odor (describe- sewage, sulfide, oil, gas, etc.)
☐ Sludge present
☐ Murky
☐ Turbidity (describe- cloudy, opaque, etc.)
☐ Floating objects (describe- floatables, oil sheen, sewage, etc.)
☐ Stains on conveyance (describe- sediment, oily, etc.)
☐ Absence of plant life surrounding conveyance
☐ Notable difference in plant life surrounding conveyance
☐ Suds
☐ Scum ☐ Other:_____

e.g., rotten eggs, earthy, chemical, chlorine, soap, putrescence, gasoline, musty, etc.

12. From the assessment locations, can you see any unusual piping or ditches that drain to the storm water conveyance?

☐ Yes ☒ No

13. Is there any overland flow visible from the discharge location? ☐ Yes ☒No

Known industrial or commercial uses in drainage area? ☐ Yes ☒No

If yes, describe _____

Signature: Bridget M Zwack, Malcolm Pirnie

NOI (PHASE II ASSESSMENT) FOR DCAM PROPERTY Grafton Complex

CHECKLIST FOR CONDUCTING OUTFALL ASSESSMENTS

1. Date of assessment: 2/28/03 and May 20, 2003
2. Outfall I.D. Outfall #2
3. Date of last rain/snow event: 2/23/03 (rain) 5/14/03 (rain)
4. Photographs: Attachment C, Figure 1-5
5. Assessor's name: Bridget Zwack
6. Weather & Temp: 2/28/03: Cloudy, 30°F 5/20/03: Sunny, 70°F
7. Type of outfall

☐ Concrete ☐ Pipe ☐ Grassed ☐ Rock ☒ Other Clay

8. Size of outfall Width_____ Height _____ Diameter 8"
9. Is there visible flow from the pipe? ☐ Yes ☒ No

If yes, check all that apply. If no, go to number 11.

☐ Colored water (describe)
☐ Oily sheen
☐ Odor (describe- sewage, sulfide, oil, gas, etc.)
☐ Sludge present
☐ Murky
☐ Turbidity (describe- cloudy, opaque, etc.)
☐ Floating objects (describe- floatables, oil sheen, sewage, etc.)
☐ Stains on conveyance (describe- sediment, oily, etc.)
☐ Absence of plant life surrounding conveyance
☐ Notable difference in plant life surrounding conveyance
☐ Scum
☐ Suds ☐ Other: _____

e.g., rotten eggs, earthy, chemical, chlorine, soap, putrescence, gasoline, musty, etc.

10. Estimated flow depth _____
11. Is there standing water present? ☐ Yes ☒ No

If yes, check all that apply. If no, go to number 12.

☐ Colored water (describe)
☐ Oily sheen
☐ Odor (describe- sewage, sulfide, oil, gas, etc.)
☐ Sludge present
☐ Murky
☐ Turbidity (describe- cloudy, opaque, etc.)
☐ Floating objects (describe- floatables, oil sheen, sewage, etc.)
☐ Stains on conveyance (describe- sediment, oily, etc.)
☐ Absence of plant life surrounding conveyance
☐ Notable difference in plant life surrounding conveyance
☐ Suds
☐ Scum ☐ Other:_____

e.g., rotten eggs, earthy, chemical, chlorine, soap, putrescence, gasoline, musty, etc.

12. From the assessment locations, can you see any unusual piping or ditches that drain to the storm water conveyance?

☐ Yes ☒ No

13. Is there any overland flow visible from the discharge location? ☐ Yes ☒No

Known industrial or commercial uses in drainage area? ☐ Yes ☒No

If yes, describe_____

Signature: Bridget M Zwack, Malcolm Pirnie

NOI (PHASE II ASSESSMENT) FOR DCAM **PROPERTY** Grafton Complex

CHECKLIST FOR CONDUCTING OUTFALL ASSESSMENTS

1. Date of assessment: 2/28/03 and May 20, 2003
2. Outfall I.D. Outfall #3
3. Date of last rain/snow event: 2/23/03 (rain) 5/14/03 (rain)
4. Photographs: Attachment C, Figure 2-15
5. Assessor's name: Bridget Zwack
6. Weather & Temp: 2/28/03: Cloudy, 30°F 5/20/03: Sunny, 70°F
7. Type of outfall

☒ Concrete ☐ Pipe ☐ Grassed ☐ Rock ☐ Other _____

8. Size of outfall Width: Unable to Determine Height: Unable to Determine
9. Is there visible flow from the pipe? ☒ Yes ☐ No

If yes, check all that apply. If no, go to number 11.

☐ Colored water (describe)
☐ Oily sheen
☐ Odor (describe- sewage, sulfide, oil, gas, etc.)
☐ Sludge present
☐ Murky
☐ Turbidity (describe- cloudy, opaque, etc.)
☐ Floating objects (describe- floatables, oil sheen, sewage, etc.)
☐ Stains on conveyance (describe- sediment, oily, etc.)
☐ Absence of plant life surrounding conveyance
☐ Notable difference in plant life surrounding conveyance
☐ Scum
☐ Suds ☐ Other: _____

e.g., rotten eggs, earthy, chemical, chlorine, soap, putrescence, gasoline, musty, etc.

10. Estimated flow depth: Unable to Determine
11. Is there standing water present? ☐ Yes ☒ No Is there flowing discharge present? ☒ Yes ☐ No

If yes, check all that apply. If no, go to number 12.

☐ Colored water (describe)
☐ Oily sheen
☐ Odor (describe- sewage, sulfide, oil, gas, etc.)
☐ Sludge present
☐ Murky
☐ Turbidity (describe- cloudy, opaque, etc.)
☐ Floating objects (describe- floatables, oil sheen, sewage, etc.)
☐ Stains on conveyance (describe- sediment, oily, etc.)
☐ Absence of plant life surrounding conveyance
☐ Notable difference in plant life surrounding conveyance
☐ Suds
☐ Scum ☒ Other: Odorless, colorless

e.g., rotten eggs, earthy, chemical, chlorine, soap, putrescence, gasoline, musty, etc.

12. From the assessment locations, can you see any unusual piping or ditches that drain to the storm water conveyance?

☐ Yes ☒ No

13. Is there any overland flow visible from the discharge location? ☐ Yes ☒ No

Known industrial or commercial uses in drainage area? ☐ Yes ☒ No

If yes, describe_____

14. **Comments:**

Signature: Bridget M Zwack, Malcolm Pirnie

NOI (PHASE II ASSESSMENT) FOR DCAM PROPERTY Grafton Complex

CHECKLIST FOR CONDUCTING OUTFALL ASSESSMENTS

1. Date of assessment 5/20/03
2. Outfall I.D. Outfall #4
3. Date of last rain/snow event: 5/14/03 (rain)
4. Photographs: Attachment C, Figure 2-17
5. Assessor's name: Bridget Zwack
6. Weather & Temp Sunny, 70°F
7. Type of outfall

☐ Concrete ☐ Pipe ☐ Grassed ☐ Rock ☒ Other Clay

8. Size of outfall Width_____ Height _____ Diameter: 8"
9. Is there visible flow from the pipe? ☐ Yes ☒ No

If yes, check all that apply. If no, go to number 11.

☐ Colored water (describe)
☐ Oily sheen
☐ Odor (describe- sewage, sulfide, oil, gas, etc.)
☐ Sludge present
☐ Murky
☐ Turbidity (describe- cloudy, opaque, etc.)
☐ Floating objects (describe- floatables, oil sheen, sewage, etc.)
☐ Stains on conveyance (describe- sediment, oily, etc.)
☐ Absence of plant life surrounding conveyance
☐ Notable difference in plant life surrounding conveyance
☐ Scum
☐ Suds ☐ Other: _____

e.g., rotten eggs, earthy, chemical, chlorine, soap, putrescence, gasoline, musty, etc.

10. Estimated flow depth _____
11. Is there standing water present? ☐ Yes ☒ No

If yes, check all that apply. If no, go to number 12.

☐ Colored water (describe)
☐ Oily sheen
☐ Odor (describe- sewage, sulfide, oil, gas, etc.)
☐ Sludge present
☐ Murky
☐ Turbidity (describe- cloudy, opaque, etc.)
☐ Floating objects (describe- floatables, oil sheen, sewage, etc.)
☐ Stains on conveyance (describe- sediment, oily, etc.)
☐ Absence of plant life surrounding conveyance
☐ Notable difference in plant life surrounding conveyance
☐ Suds
☐ Scum ☐ Other:_____

e.g., rotten eggs, earthy, chemical, chlorine, soap, putrescence, gasoline, musty, etc.

12. From the assessment locations, can you see any unusual piping or ditches that drain to the storm water conveyance?

☐ Yes ☒ No

13. Is there any overland flow visible from the discharge location? ☐ Yes ☒No

Known industrial or commercial uses in drainage area? ☐ Yes ☒No

If yes, describe_____

14. **Comments:**

Signature: Bridget M Zwack, Malcolm Pirnie

NOI (PHASE II ASSESSMENT) FOR DCAM PROPERTY Grafton Complex

CHECKLIST FOR CONDUCTING OUTFALL ASSESSMENTS

1. Date of assessment 5/20/03
2. Outfall I.D. Outfall #5
3. Date of last rain/snow event: 5/14/03 (rain)
4. Photographs: Attachment C, Figure 2-19
5. Assessor's name: Bridget Zwack
6. Weather & Temp Sunny, 70°F
7. Type of outfall

☐ Concrete ☐ Pipe ☐ Grassed ☒ Rock ☐ Other _____

8. Size of outfall Width_____ Height _____ Diameter: Unable to determine
9. Is there visible flow from the pipe? ☐ Yes ☒ No

If yes, check all that apply. If no, go to number 11.

☐ Colored water (describe)
☐ Oily sheen
☐ Odor (describe- sewage, sulfide, oil, gas, etc.)
☐ Sludge present
☐ Murky
☐ Turbidity (describe- cloudy, opaque, etc.)
☐ Floating objects (describe- floatables, oil sheen, sewage, etc.)
☐ Stains on conveyance (describe- sediment, oily, etc.)
☐ Absence of plant life surrounding conveyance
☐ Notable difference in plant life surrounding conveyance
☐ Scum
☐ Suds ☐ Other: _____

e.g., rotten eggs, earthy, chemical, chlorine, soap, putrescence, gasoline, musty, etc.

10. Estimated flow depth _____
11. Is there standing water present? ☐ Yes ☒ No

If yes, check all that apply. If no, go to number 12.

☐ Colored water (describe)
☐ Oily sheen
☐ Odor (describe- sewage, sulfide, oil, gas, etc.)
☐ Sludge present
☐ Murky
☐ Turbidity (describe- cloudy, opaque, etc.)
☐ Floating objects (describe- floatables, oil sheen, sewage, etc.)
☐ Stains on conveyance (describe- sediment, oily, etc.)
☐ Absence of plant life surrounding conveyance
☐ Notable difference in plant life surrounding conveyance
☐ Suds
☐ Scum ☐ Other:_____

e.g., rotten eggs, earthy, chemical, chlorine, soap, putrescence, gasoline, musty, etc.

12. From the assessment locations, can you see any unusual piping or ditches that drain to the storm water conveyance?

☐ Yes ☒ No

13. Is there any overland flow visible from the discharge location? ☐ Yes ☒No

Known industrial or commercial uses in drainage area? ☐ Yes ☒No

If yes, describe_____

14. **Comments:**

Signature: Bridget M Zwack, Malcolm Pirnie

NOI (PHASE II ASSESSMENT) FOR DCAM PROPERTY Grafton Complex

CHECKLIST FOR CONDUCTING OUTFALL ASSESSMENTS

1. Date of assessment: 2/28/03 and May 20, 2003
2. Outfall I.D. Outfall #6
3. Date of last rain/snow event: 2/23/03 (rain) 5/14/03 (rain)
4. Photographs: Attachment C, Figure 2-15
5. Assessor's name: Bridget Zwack
6. Weather & Temp: 2/28/03: Cloudy, 30°F 5/20/03: Sunny, 70°F
7. Type of outfall

☐ Concrete ☐ Pipe ☐ Grassed ☐ Rock ☒ Other Clay

8. Size of outfall Width_____ Height _____ Diameters: 8"
9. Is there visible flow from the pipe? ☐ Yes ☒ No

If yes, check all that apply. If no, go to number 11.

☐ Colored water (describe)
☐ Oily sheen
☐ Odor (describe- sewage, sulfide, oil, gas, etc.)
☐ Sludge present
☐ Murky
☐ Turbidity (describe- cloudy, opaque, etc.)
☐ Floating objects (describe- floatables, oil sheen, sewage, etc.)
☐ Stains on conveyance (describe- sediment, oily, etc.)
☐ Absence of plant life surrounding conveyance
☐ Notable difference in plant life surrounding conveyance
☐ Scum
☐ Suds ☐ Other: _____

e.g., rotten eggs, earthy, chemical, chlorine, soap, putrescence, gasoline, musty, etc.

10. Estimated flow depth _____
11. Is there standing water present? ☐ Yes ☒ No

If yes, check all that apply. If no, go to number 12.

☐ Colored water (describe)
☐ Oily sheen
☐ Odor (describe- sewage, sulfide, oil, gas, etc.)
☐ Sludge present
☐ Murky
☐ Turbidity (describe- cloudy, opaque, etc.)
☐ Floating objects (describe- floatables, oil sheen, sewage, etc.)
☐ Stains on conveyance (describe- sediment, oily, etc.)
☐ Absence of plant life surrounding conveyance
☐ Notable difference in plant life surrounding conveyance
☐ Suds
☐ Scum ☐ Other:_____

e.g., rotten eggs, earthy, chemical, chlorine, soap, putrescence, gasoline, musty, etc.

12. From the assessment locations, can you see any unusual piping or ditches that drain to the storm water conveyance?

☐ Yes ☒ No

13. Is there any overland flow visible from the discharge location? ☐ Yes ☒No

Known industrial or commercial uses in drainage area? ☐ Yes ☒No

If yes, describe_____

Signature: Bridget M Zwack, Malcolm Pirnie

NOI (PHASE II ASSESSMENT) FOR DCAM PROPERTY Grafton Complex

CHECKLIST FOR CONDUCTING OUTFALL ASSESSMENTS

1. Date of assessment: May 20, 2003
2. Outfall I.D. Outfall #7
3. Date of last rain/snow event: 5/14/03 (rain)
4. Photographs: Attachment C, Figure 2-3
5. Assessor's name: Bridget Zwack
6. Weather & Temp: 5/20/03: Cloudy, 70°F
7. Type of outfall

☒ Concrete ☐ Pipe ☐ Grassed ☐ Rock ☐ Other: _____

8. Size of outfall Width Unable to Determine Height Unable to Determine
Diameter: _____

9. Is there visible flow from the pipe? ☐ Yes ☒ No

If yes, check all that apply. If no, go to number 11.

- ☐ Colored water (describe)
- ☐ Odor (describe- sewage, sulfide, oil, gas, etc.)
- ☐ Murky
- ☐ Floating objects (describe- floatables, oil sheen, sewage, etc.)
- ☐ Absence of plant life surrounding conveyance
- ☐ Scum
- ☐ Oily sheen
- ☐ Sludge present
- ☐ Turbidity (describe- cloudy, opaque, etc.)
- ☐ Stains on conveyance (describe- sediment, oily, etc.)
- ☐ Notable difference in plant life surrounding conveyance
- ☐ Suds ☐ Other: _____

e.g., rotten eggs, earthy, chemical, chlorine, soap, putrescence, gasoline, musty, etc.

10. Estimated flow depth _____

11. Is there standing water present? ☐ Yes ☒ No

If yes, check all that apply. If no, go to number 12.

- ☐ Colored water (describe)
- ☐ Odor (describe- sewage, sulfide, oil, gas, etc.)
- ☐ Murky
- ☐ Floating objects (describe- floatables, oil sheen, sewage, etc.)
- ☐ Absence of plant life surrounding conveyance
- ☐ Suds
- ☐ Oily sheen
- ☐ Sludge present
- ☐ Turbidity (describe- cloudy, opaque, etc.)
- ☐ Stains on conveyance (describe- sediment, oily, etc.)
- ☐ Notable difference in plant life surrounding conveyance
- ☐ Scum ☐ Other: _____

e.g., rotten eggs, earthy, chemical, chlorine, soap, putrescence, gasoline, musty, etc.

12. From the assessment locations, can you see any unusual piping or ditches that drain to the storm water conveyance?

☐ Yes ☒ No

13. Is there any overland flow visible from the discharge location? ☐ Yes ☒ No

Known industrial or commercial uses in drainage area? ☐ Yes ☒ No

If yes, describe _____

Signature: Bridget M Zwack, Malcolm Pirnie

NOI (PHASE II ASSESSMENT) FOR DCAM PROPERTY Grafton Complex

CHECKLIST FOR CONDUCTING OUTFALL ASSESSMENTS

1. Date of assessment: May 20, 2003
2. Outfall I.D. Outfall #8
3. Date of last rain/snow event: 5/14/03 (rain)
4. Photographs: Attachment C, Figure 2-4
5. Assessor's name: Bridget Zwack
6. Weather & Temp: 5/20/03: Cloudy, 70°F
7. Type of outfall

☒ Concrete ☐ Pipe ☐ Grassed ☐ Rock ☐ Other: _____

8. Size of outfall Width 2' Height _____ Diameter: 12"
9. Is there visible flow from the pipe? ☐ Yes ☒ No

If yes, check all that apply. If no, go to number 11.

- ☐ Colored water (describe)
- ☐ Oily sheen
- ☐ Odor (describe- sewage, sulfide, oil, gas, etc.)
- ☐ Sludge present
- ☐ Murky
- ☐ Turbidity (describe- cloudy, opaque, etc.)
- ☐ Floating objects (describe- floatables, oil sheen, sewage, etc.)
- ☐ Stains on conveyance (describe- sediment, oily, etc.)
- ☐ Absence of plant life surrounding conveyance
- ☐ Notable difference in plant life surrounding conveyance
- ☐ Scum
- ☐ Suds ☐ Other: _____

e.g., rotten eggs, earthy, chemical, chlorine, soap, putrescence, gasoline, musty, etc.

10. Estimated flow depth _____
11. Is there standing water present? ☐ Yes ☒ No

If yes, check all that apply. If no, go to number 12.

- ☐ Colored water (describe)
- ☐ Oily sheen
- ☐ Odor (describe- sewage, sulfide, oil, gas, etc.)
- ☐ Sludge present
- ☐ Murky
- ☐ Turbidity (describe- cloudy, opaque, etc.)
- ☐ Floating objects (describe- floatables, oil sheen, sewage, etc.)
- ☐ Stains on conveyance (describe- sediment, oily, etc.)
- ☐ Absence of plant life surrounding conveyance
- ☐ Notable difference in plant life surrounding conveyance
- ☐ Suds
- ☐ Scum ☐ Other: _____

e.g., rotten eggs, earthy, chemical, chlorine, soap, putrescence, gasoline, musty, etc.

12. From the assessment locations, can you see any unusual piping or ditches that drain to the storm water conveyance?

☐ Yes ☒ No

13. Is there any overland flow visible from the discharge location? ☐ Yes ☒No

Known industrial or commercial uses in drainage area? ☐ Yes ☒No

If yes, describe _____

Signature: Bridget M Zwack, Malcolm Pirnie

NOI (PHASE II ASSESSMENT) FOR DCAM PROPERTY Grafton Complex

CHECKLIST FOR CONDUCTING OUTFALL ASSESSMENTS

1. Date of assessment: May 20, 2003
2. Outfall I.D. Outfall #9
3. Date of last rain/snow event: 5/14/03 (rain)
4. Photographs: Attachment C, Figure 2-6
5. Assessor's name: Bridget Zwack
6. Weather & Temp: 5/20/03: Cloudy, 70°F
7. Type of outfall

☐ Concrete ☐ Pipe ☐ Grassed ☐ Rock ☒ Other: Clay

8. Size of outfall Width_____ Height _____ Diameters 8"

9. Is there visible flow from the pipe? ☒ Yes ☐ No

If yes, check all that apply. If no, go to number 11.

☐ Colored water (describe)
☐ Oily sheen
☐ Odor (describe- sewage, sulfide, oil, gas, etc.)
☐ Sludge present
☐ Murky
☐ Turbidity (describe- cloudy, opaque, etc.)
☐ Floating objects (describe- floatables, oil sheen, sewage, etc.)
☐ Stains on conveyance (describe- sediment, oily, etc.)
☐ Absence of plant life surrounding conveyance
☐ Notable difference in plant life surrounding conveyance
☐ Scum
☐ Suds ☐ Other: Clear, odorless, no garbage or sewage

e.g., rotten eggs, earthy, chemical, chlorine, soap, putrescence, gasoline, musty, etc.

10. Estimated flow depth _____

11. Is there standing water present? ☐ Yes ☒ No

If yes, check all that apply. If no, go to number 12.

☐ Colored water (describe)
☐ Oily sheen
☐ Odor (describe- sewage, sulfide, oil, gas, etc.)
☐ Sludge present
☐ Murky
☐ Turbidity (describe- cloudy, opaque, etc.)
☐ Floating objects (describe- floatables, oil sheen, sewage, etc.)
☐ Stains on conveyance (describe- sediment, oily, etc.)
☐ Absence of plant life surrounding conveyance
☐ Notable difference in plant life surrounding conveyance
☐ Suds
☐ Scum ☐ Other:_____

e.g., rotten eggs, earthy, chemical, chlorine, soap, putrescence, gasoline, musty, etc.

12. From the assessment locations, can you see any unusual piping or ditches that drain to the storm water conveyance?

☐ Yes ☒ No

13. Is there any overland flow visible from the discharge location? ☐ Yes ☒No

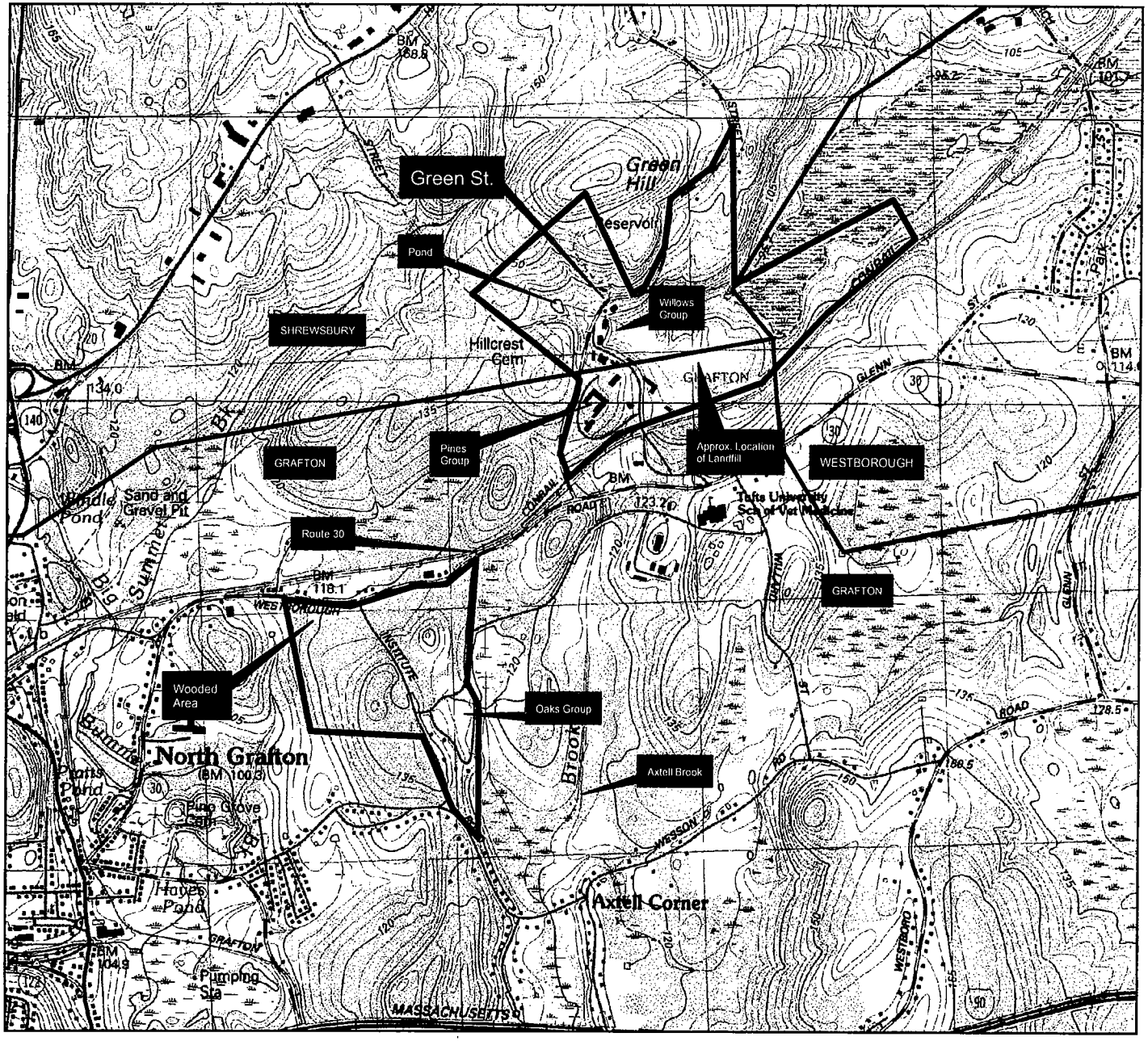
Known industrial or commercial uses in drainage area? ☐ Yes ☒No

If yes, describe_____

Signature: Bridget M Zwack, Malcolm Pirnie

ATTACHMENT B
Site Maps

Figure 1
DCAM Surplus Properties - Grafton Complex
NPDES Phase II Assessment Report



LEGEND

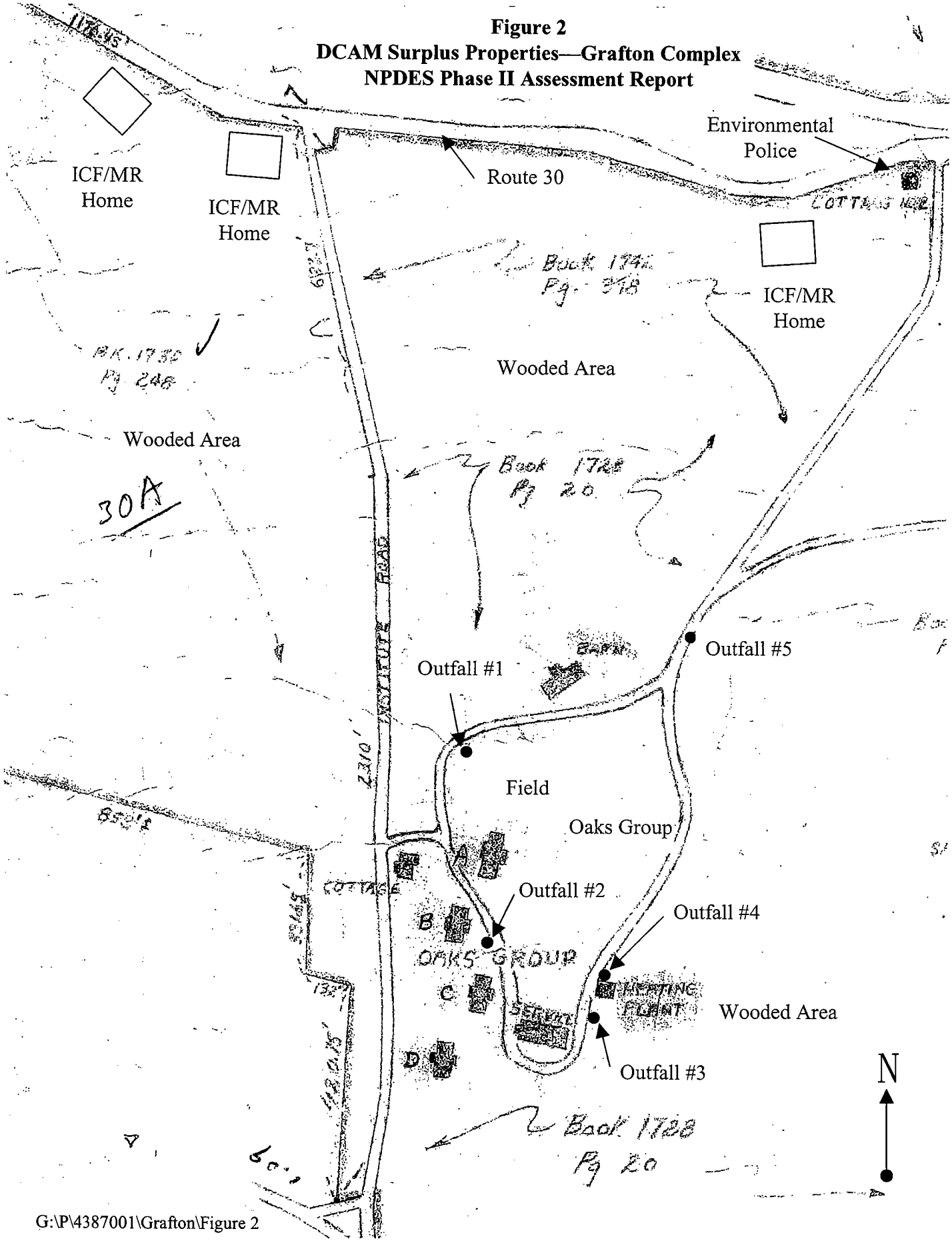
Approximate Property Boundary

Town Boundary

N
W E
S

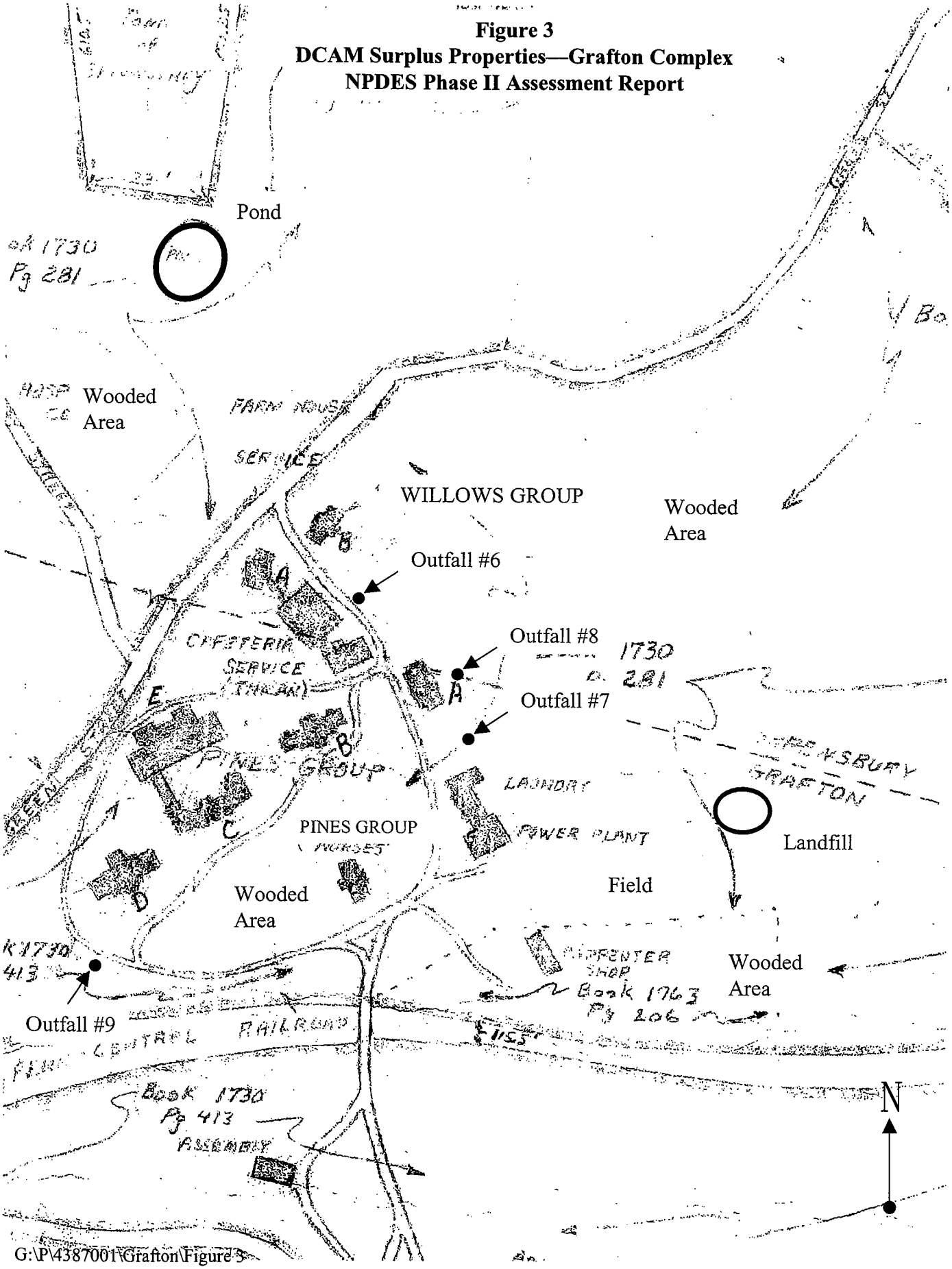
Z:_0440 DCAM_Grafton.mxb

Figure 2
DCAM Surplus Properties—Grafton Complex
NPDES Phase II Assessment Report



G:\P\4387001\Grafton\Figure 2

Figure 3
DCAM Surplus Properties—Grafton Complex
NPDES Phase II Assessment Report



G:\P\4387001\Grafton\Figure 3

ATTACHMENT C
Photographs

Figure 1
DCAM Surplus Properties—Grafton Complex
NPDES Phase II Assessment Report
February 28, 2003

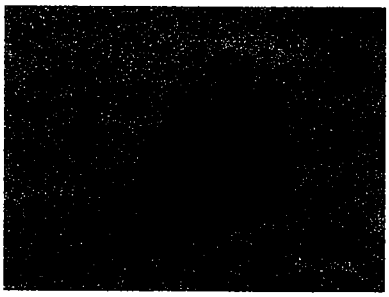


Figure 1-1
Outfall #1.

Figure 1-2
Outfall #1 drains into an open field.

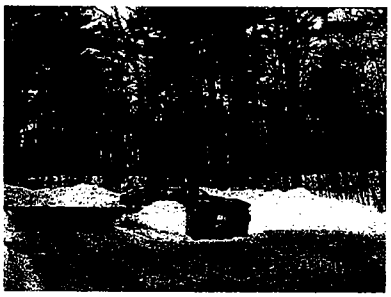


Figure 1-3
Dumpster located north of Cottage E in Oaks Group.

Figure 1-4
Two propane tanks fenced-in and on a concrete pad next to B-Building in Oaks Group.

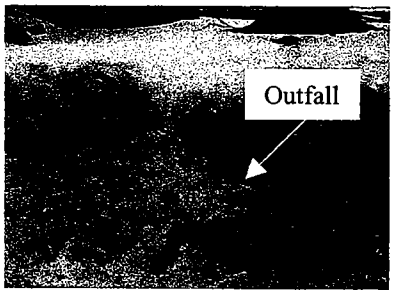


Figure 1-5
Outfall #2.

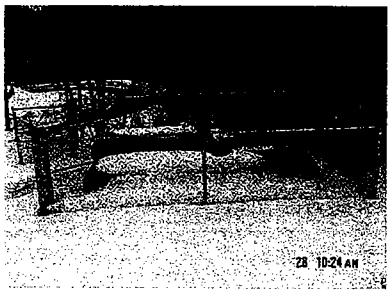


Figure 1-6
Two propane tanks fenced-in and on a concrete pad east of D-Building in Oaks Group.

Figure 1-7
Service Building in Oaks Group.

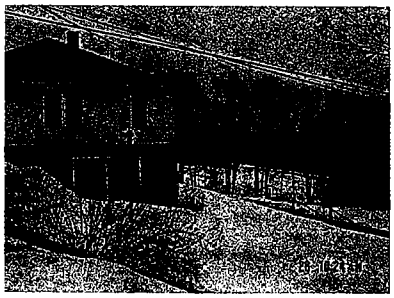


Figure 1-8
D-Building in Oaks Group.

Figure 1-9
Power Plant in Oaks Group.

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Figure 1
DCAM Surplus Properties—Grafton Complex
NPDES Phase II Assessment Report
February 28, 2003

Figure 1-10
Wooded area next to Power Plant where Outfall #3 is suspected of discharging to.

Figure 1-11
Wooded area where Outfall #4 is suspected of discharging to.

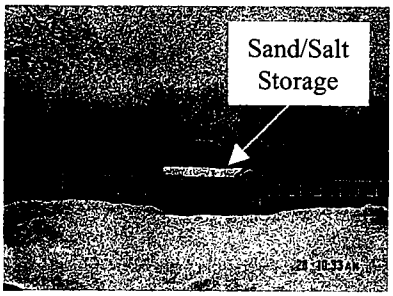

Figure 1-12
Barn.

Figure 1-13
Wooded area next to Power Plant where Outfall #5 is suspected of discharging to.

Figure 1-14
Home operated by ICF.

Figure 1-15
Home operated by ICF.

Figure 1-16
Closed dumpster at ICF home.

Figure 1-17
Location of landfill.

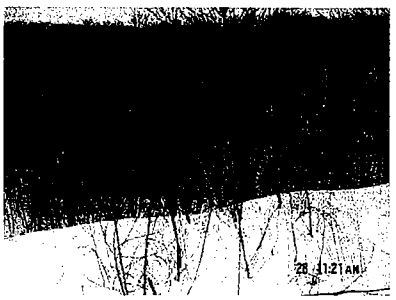

Figure 1-18
Steep embankment on north side of landfill.

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Figure 1
DCAM Surplus Properties—Grafton Complex
NPDES Phase II Assessment Report
February 28, 2003

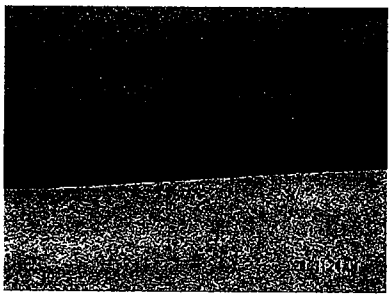

Figure 1-19
Open field area (wooded area in background) south of landfill.

Figure 1-20
Open field area west of landfill.

Figure 1-21
Wooded area south of C-Building in Pines Group.

Figure 1-22
D-Building in Pines Group.

Figure 1-23
Lawn area (wooded area in background) south of D-Building in Pines Group.

Figure 1-24
Suspected outfall or brook located here.

Figure 1-25
E-Building in Pines Group.

Figure 1-26
Cafeteria Service building in Pines Group.

Figure 1-27
Wooded area southwest of the Cafeteria Service Building in Pines Group.

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Figure 1
DCAM Surplus Properties—Grafton Complex
NPDES Phase II Assessment Report
February 28, 2003

Figure 1-28
Section of land on Green Street owned by DCAM.

Figure 1-29
Discharge from pond near Green Street.

Figure 1-30
Outfall #6.

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Figure 2
DCAM Surplus Properties—Grafton Complex
NPDES Phase II Assessment Report
May 20, 2003

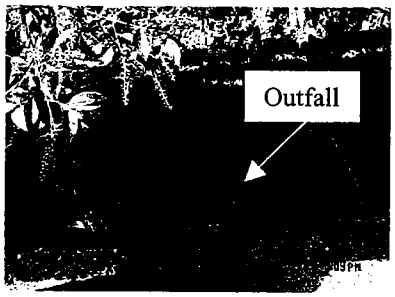

Figure 2-1
Outfall #6.

Figure 2-2
Outfall #6 drains into wooded area.

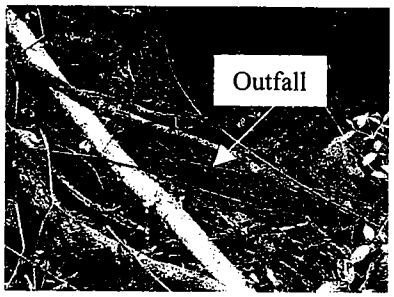

Figure 2-3
Outfall #7 covered by asphalt and tree debris.

Figure 2-4
Outfall #8.

Figure 2-5
Wooded area on west side of Pines Group.

Figure 2-6
Outfall #9.

Figure 2-7
Outfall #9 Outlet.

Figure 2-8
Lawn on south side of Pines Group.

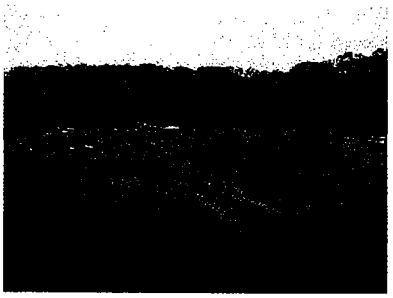

Figure 2-9
Field south of landfill.

G:P\4732002\Grafton\Figure 2a

Figure 2
DCAM Surplus Properties—Grafton Complex
NPDES Phase II Assessment Report
May 20, 2003

Figure 2-10
Landfill.

Figure 2-11
Dumpster next to Power Plant.

Figure 2-12
Access roadway.

Figure 2-13
Field in Oaks Group.

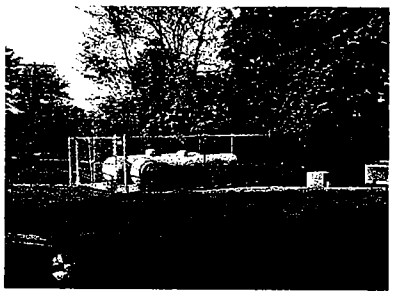

Figure 2-14
Two propane tanks located next to Cottage.

Figure 2-15
Outfall #3.

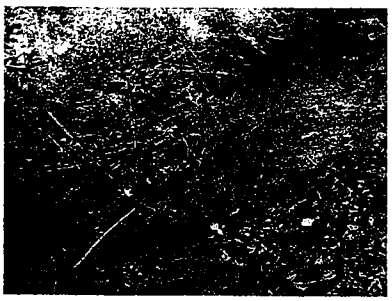

Figure 2-16
Outfall #3 Outlet.

Figure 2-17
Outfall #4.

Figure 2-18
Field and wooded area borders east of Oaks Group.

G:P\4732002\Grafton\Figure 2a

Figure 2
DCAM Surplus Properties—Grafton Complex
NPDES Phase II Assessment Report
May 20, 2003

Figure 2-19
Outfall #5.

Figure 2-20
Outfall #2.

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ATTACHMENT D
NHESP AND MHC LETTERS

MALCOLM PIRNIE

MALCOLM PIRNIE, INC.
INDEPENDENT ENVIRONMENTAL ENGINEERS, SCIENTISTS & CONSULTANTS

May 12, 2003

Natural Heritage Review
Natural Heritage and Endangered Species Program (NHESP)
MA Division of Fisheries and Wildlife
Route 135
Westborough, MA 01581

Re: Division of Capital Asset Management Properties

To Whom It May Concern:

The Division of Capital Asset Management (DCAM) under the Commonwealth of Massachusetts is assessing properties for compliance with the Environmental Protection Agency's (EPA's) Storm Water National Pollutant Discharge Elimination System (NPDES) Phase II requirements. These properties include the following:

- Metropolitan State Hospital (Belmont, Lexington, and Waltham)
- Middlesex County Hospital (Lexington and Waltham)
- Boston State Hospital (Boston)
- Foxborough State Hospital (Foxborough)
- Worcester County Hospital (West Boylston)
- Oakdale Complex (West Boylston)
- Lancaster Complex (Lancaster)
- Rutland Heights Hospital (Rutland)
- J.T. Berry Regional Center (North Reading and Wilmington)
- Danvers State Hospital / Essex Agricultural (Danvers)
- Grafton Complex (Grafton, Shrewsbury, Westborough)
- Lyman School for Boys (Westborough)
- Medfield State Hospital (Medfield)

As part of the Phase II requirements, eligibility criteria for endangered and threatened species and their critical habitats must be met. Coverage under the Phase II permit is only granted if storm water discharges, allowable non-storm water discharges, and discharge related activities do not adversely affect species that are listed as endangered or threatened under the Endangered Species Act (ESA). In order to assist in determining eligibility, Malcolm Pirnie has submitted the enclosed "Rare Species Information Request Form" and USGS topography maps for each property on behalf of DCAM to the NHESP to identify any critical habitats of endangered and threatened species that exist within each property.

Malcolm Pirnie is requesting a list and location of endangered and threatened species within each property from the NHESP as well as any other applicable information that will assist in determining eligibility criteria under Phase II.

If you have any questions or comments on this letter, please do not hesitate to contact me at (781) 224-4488.

Very truly yours,

MALCOLM PIRNIE, INC.

Bridget M Zinn

[redacted]
Engineer

Enclosure
cc: Robert Winn
File 4732002-C

G:\BusDev\DCAM stormwater\species letter

Rare Species Information Request Form

Please complete this form to request site-specific information from The Natural Heritage and Endangered Species Program database (Please submit only one project per request form).

Requestor Information

Name: Bridget Zwack

Affiliation: Malcolm Pirnie, Inc.

Address: 500 Edgewater Drive, Suite 566

City: Wakefield State: MA Zip Code: 01880

Daytime Phone: (781) 224-4488 Ext.

Project Information

Project or Site Name: Grafton Complex

Town: Grafton, Shrewsbury, Westborough USGS Quad Map:

Name of Landowner or Project Proponent: Commonwealth of Massachusetts : Division of Capital Asset Management (DCAM)

Description of Proposed Project: (If necessary attach additional sheet)

(See Attached Cover Letter)

- ☐ N Will this project be reviewed as a Notice of Intent by the local Conservation Commission?
- ☐ Y Will this project be undergoing review through MEPA?
- ☐ Y Have you enclosed the required copy of a USGS topographic map in the scale 1:24,000 or 1:25,000 (not copy reduced) with the site location clearly marked and centered on the copy page? (Copies of Atlas pages are not accepted)

Please **mail** this completed form and topographic map to:
Environmental Review
Natural Heritage and Endangered Species Program
MA Division of Fisheries and Wildlife
Rte. 135
Westborough, MA 01581

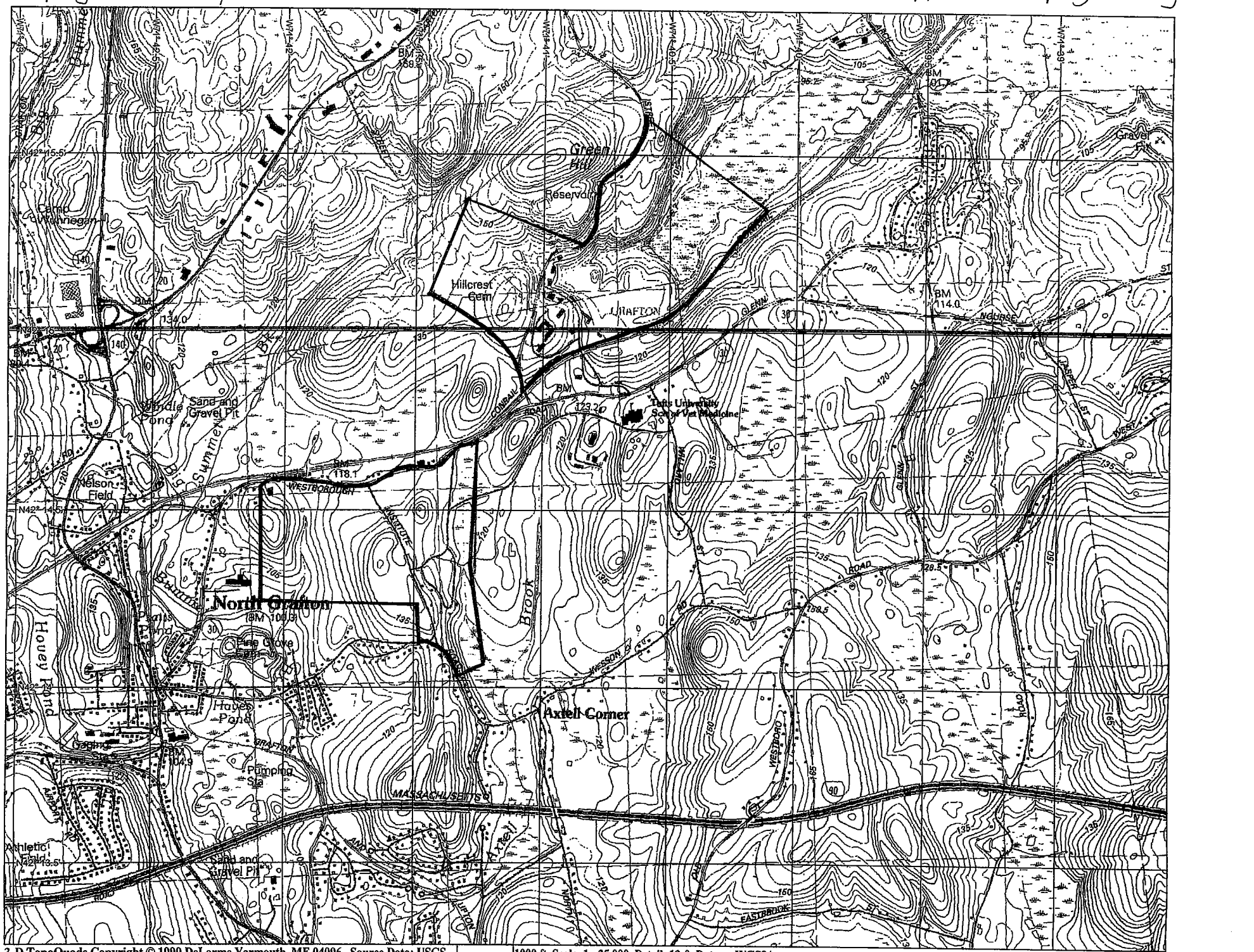
Or **fax** to: (508) 792-7275
Natural Heritage Program
Attn: Environmental Review

*Questions regarding this form should be directed to (508) 792-7270 ext. 154

Persons requesting information should expect a 4 week turnaround time (time varies on amount of requests received per week). Please do not ask for an expedited review. Requests are processed in the order that they are received.

Property: Grafton Complex

Approximate Property Boundary ——



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1000 ft Scale: 1 : 25,000 Detail: 13-0 Datum: WGS84

Commonwealth of Massachusetts

Division of Fisheries & Wildlife

MassWildlife

Wayne F. MacCallum, *Director*

June 11, 2003

Bridget Zwack
Malcolm Pirnie, Inc.
500 Edgewater Drive, Suite 566
Wakefield, MA 01880

Re: Grafton Complex
Grafton, Shrewsbury, Westborough, MA
NHESP File: 03-12016

Dear Ms. Zwack,

Thank you for contacting the Natural Heritage and Endangered Species Program for information regarding state-protected rare species in the vicinity of the above referenced site. I have reviewed the site and would like to offer the following comments.

Our database indicates that the following Priority/Estimated Habitats occur on and near the property.

Species	Taxon	Status
PH 839/WH 225		
Blue-spotted Salamander (*Ambystoma laterale*)	amphibian	Special Concern
PH 828/WH 3050		
Spotted Turtle (*Clemmys guttata*)	reptile	Special Concern
PH 823/WH 6042		
Blue-spotted Salamander (*Ambystoma laterale*)	amphibian	Special Concern
Wood Turtle (*Clemmys insculpta*)	reptile	Special Concern

These species are protected under the Massachusetts Endangered Species Act (M.G.L. c. 131A) and its implementing regulations (321 CMR 10.00) as well as the state's Wetlands Protection Act (M.G.L. c. 131, s. 40) and its implementing regulations (310 CMR 10.00). Fact sheets for these species can be found on our website at www.state.ma.us/dfwele/dfw.

This evaluation is based on the most recent information available in the Natural Heritage database, which is constantly being expanded and updated through ongoing research and inventory. Should your site plans change, or new rare species information become available, this evaluation may be reconsidered.

If you have any questions regarding this review, please contact Christine Vaccaro, Environmental Review Assistant, at ext. 154.

Sincerely,

Thomas W. French

Thomas W. French, Ph.D
Assistant Director

MALCOLM PIRNIE

MALCOLM PIRNIE, INC.
INDEPENDENT ENVIRONMENTAL ENGINEERS, SCIENTISTS & CONSULTANTS

June 9, 2003

Massachusetts Historical Commission
220 Morissey Boulevard
Boston, MA 02125

Re: Division of Capital Asset Management (DCAM) Phase II Storm Water Management

To Whom It May Concern:

The Division of Capital Asset Management (DCAM) under the Commonwealth of Massachusetts is assessing properties for compliance with the Environmental Protection Agency's (EPA's) Storm Water National Pollutant Discharge Elimination System (NPDES) Phase II requirements. The Phase II Program is a general permit administered by the EPA and Massachusetts Department of Environmental Protection (MADEP). DCAM properties assessed include the following:

- Metropolitan State Hospital (Belmont, Lexington, and Waltham)
- Middlesex County Hospital (Lexington and Waltham)
- Boston State Hospital (Boston)
- Foxborough State Hospital (Foxborough)
- Worcester County Hospital (West Boylston)
- Oakdale Complex (West Boylston)
- Lancaster Complex (Lancaster)
- Rutland Heights Hospital (Rutland)
- J.T. Berry Regional Center (North Reading and Wilmington)
- Danvers State Hospital / Essex Agricultural (Danvers)
- Grafton Complex (Grafton, Shrewsbury, Westborough)
- Lyman School for Boys (Westborough)
- Medfield State Hospital (Medfield)

As part of the Phase II requirements, the Town must determine if any storm water discharges, allowable non-storm water discharges, or construction of best management practices (BMPs) to control discharges have the potential to affect a property that is listed or eligible for listing on the National Register of Historic Places and by the Massachusetts Historical Commission (MHC).

Malcolm Pirnie, on behalf of DCAM, is requesting an evaluation of each property by the MHC to determine if storm water discharges from each property will affect a historic place. In addition, Malcolm Pirnie is also requesting a list and location of historic sites that may be near each property as well as a verification that the information provided on

the attached Project Notification Form is correct to complete the Notice of Intent (NOI) for the Phase II permit.

Included are a Project Notification Form (Form) and USGS quadrangle map for each property as requested by the MHC for project review. A summary of the information provided on the Forms includes the following:

- Demolition, rehabilitation, and new construction of buildings are not planned at each property.
- Most of the properties are historic sites as designated under the NRDIS (National Register District), NRMPS (National Register of Multiple Property Submission), and LHD (Local Historic District)
- Acreages of land cover are approximate for each property.

In addition, outfall locus maps are included for those properties that have known outfalls based on available mapping and assessments conducted.

If you have any questions or comments on this letter, please do not hesitate to contact me at (781) 224-4488.

Very truly yours,

MALCOLM PIRNIE, INC.

Bridget Zwack
Engineer

Enclosure
cc: Robert Winn
File 4732002-C

G:\BusDev\DCAM stormwater\MHC letter

APPENDIX A
MASSACHUSETTS HISTORICAL COMMISSION
220 MORRISSEY BOULEVARD
BOSTON, MASS. 02125
617-727-8470, FAX: 617-727-5128

PROJECT NOTIFICATION FORM

Project Name: DCAM Phase II Storm Water Management

Location / Address: Grafton Complex, Route 30, Grafton, MA 01519

City / Town: Grafton, Shrewsbury, Westborough (located in all 3 Towns)

Project Proponent

Name: Malcolm Pirnie

Address: 500 Edgewater Drive, Suite 566

City/Town/Zip/Telephone: Wakefield, MA 01880 (781) 224-4488

Agency license or funding for the project (list all licenses, permits, approvals, grants or other entitlements being sought from state and federal agencies).

Agency Name	Type of License or funding (specify)
EPA & MADEP	NPDES General Permit for Storm Water Discharges from Small MS4s

Project Description (narrative):

(See Attached Letter)

Does the project include demolition? If so, specify nature of demolition and describe the building(s) which are proposed for demolition.

NO

Does the project include rehabilitation of any existing buildings? If so, specify nature of rehabilitation and describe the building(s) which are proposed for rehabilitation.

NO

Does the project include new construction? If so, describe (attach plans and elevations if necessary).

NO

APPENDIX A (continued)

To the best of your knowledge, are any historic or archaeological properties known to exist within the project's area of potential impact? If so, specify.
MHC's "State Register of Historic Places 2002" lists Grafton Complex as historic place. Designated as historic under NRMPS and NRDDE.
What is the total acreage of the project area? 375 Acres

Woodland	150 acres	Productive Resources:	
Wetland	38 acres	Agriculture	acres
Floodplain	acres	Forestry	acres
Open space	74 acres	Mining/Extraction	acres
Developed	113 acres	Total Project Acreage	375 acres

What is the acreage of the proposed new construction? 0 acres

What is the present land use of the project area?
Grafton Complex is used for residential care housing, office supply storage, and part of complex is education center for Job Corp.

Please attach a copy of the section of the USGS quadrangle map which clearly marks the project location.

This Project Notification Form has been submitted to the MHC in compliance with 950 CMR 71.00.

Signature of Person submitting this form: Bridget M Zwack Date: 10/9/03

Name: Bridget M. Zwack

Address: 500 Edgewater Drive, Suite 506

City/Town/Zip: Wakefield, MA 01880

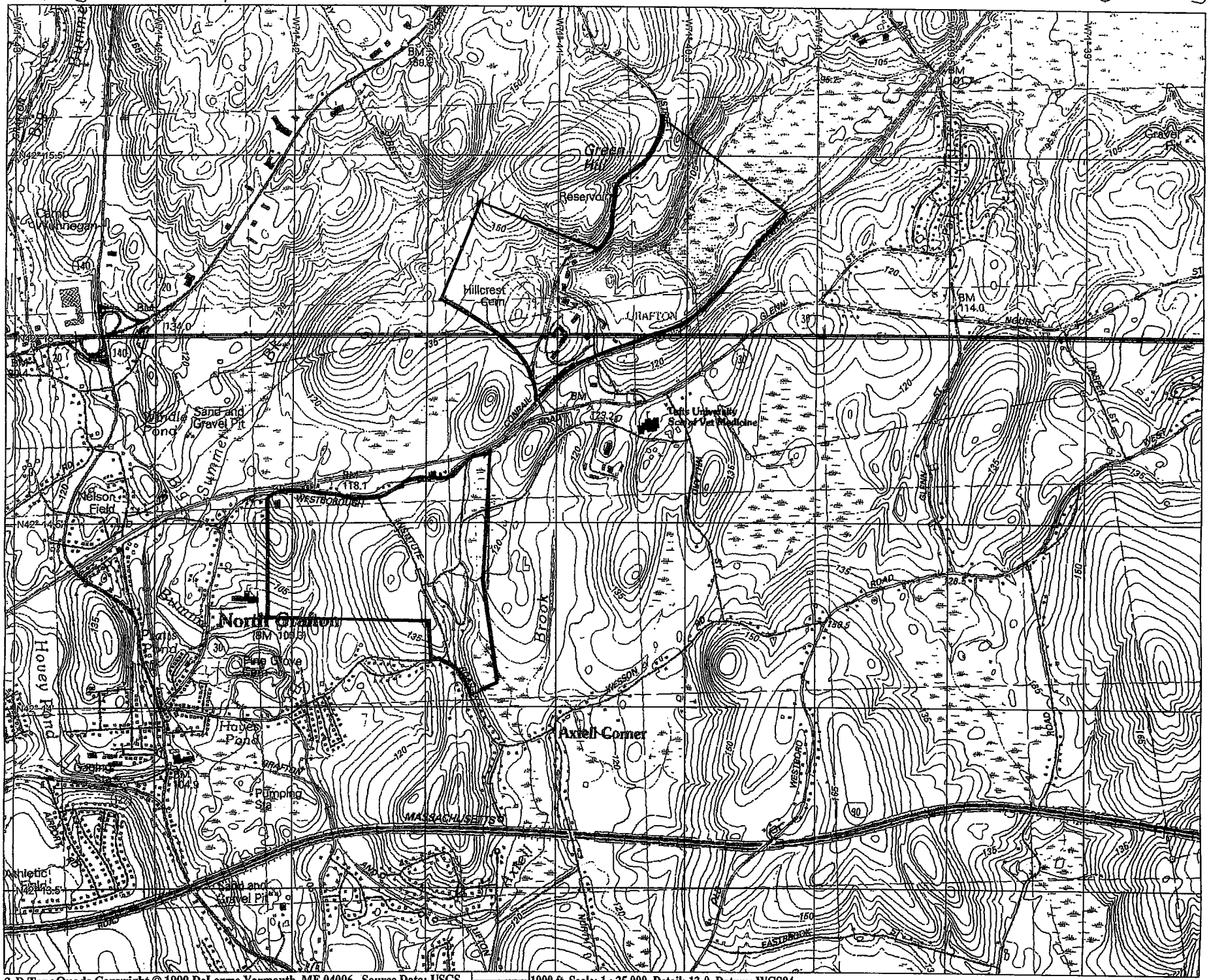
Telephone: (781) 224-4488

REGULATORY AUTHORITY

950 CMR 71.00: M.G.L. c. 9, §§ 26-27C as amended by St. 1988, c. 254.

Property: Grafton Complex

Approximate Property Boundary



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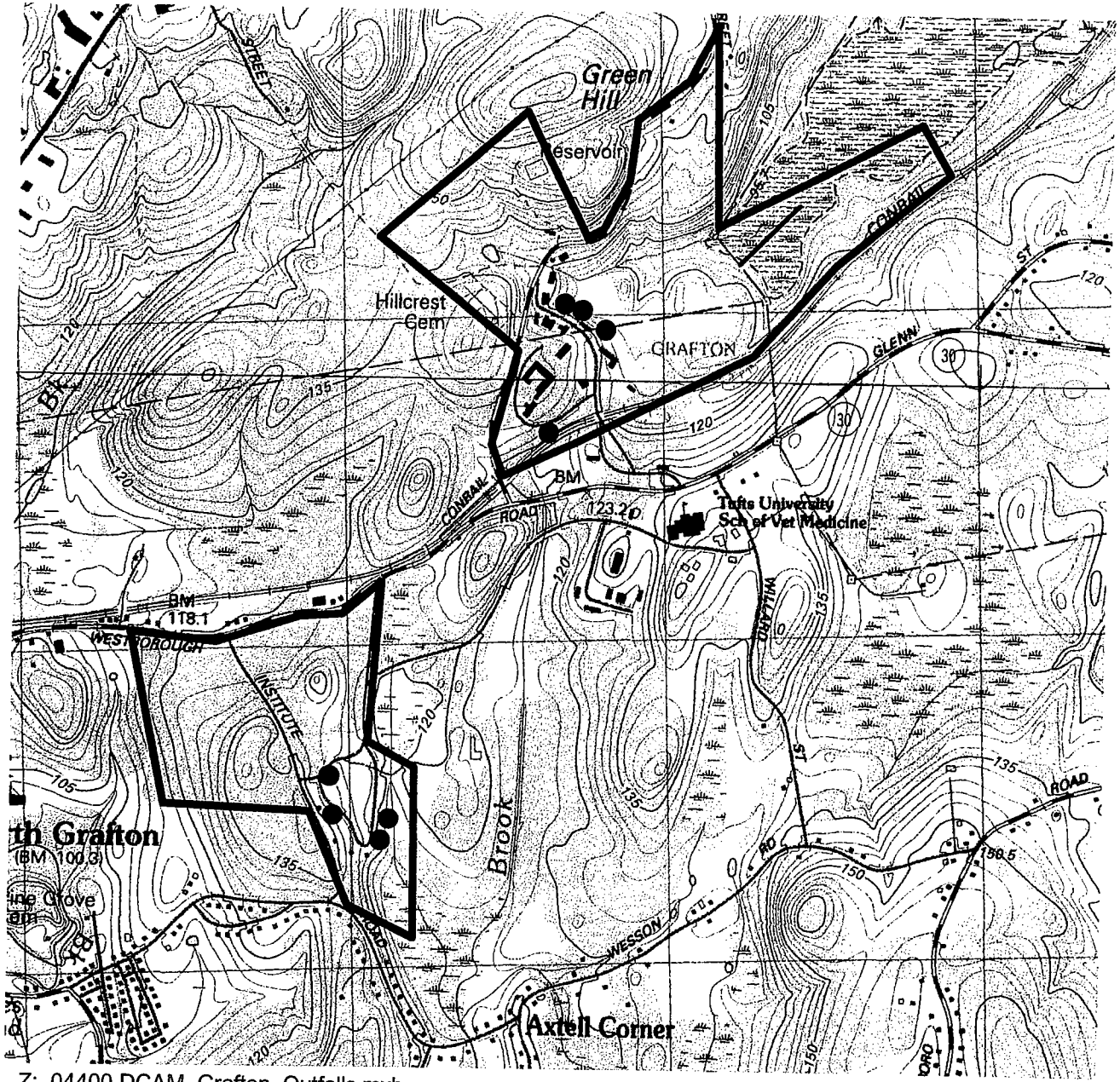
1000 ft Scale: 1 : 25,000 Detail: 13-0 Datum: WGS84

DCAM - Grafton Complex
Outfall Locus Map



Outfall

Property Boundary

N

W E

S