

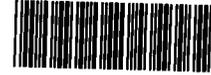
US EPA ARCHIVE DOCUMENT

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



Superfund
 Site Wells G & H
 DDC# 119
 OTHER: 282318

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 EPA NEW ENGLAND
 1 CONGRESS STREET, SUITE 1100
 BOSTON, MA 02114-2023



SDMS DocID 282318

URGENT LEGAL MATTER -- PROMPT REPLY NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

April 14, 2005

Jeffrey Renton, Esq.
 Gilbert & Renton P.C.
 23 Main Street
 Andover MA 01810

Re: Request for Information Pursuant to Section 104 of CERCLA regarding Aborjona Auto Parts, Inc. and other activity at the property located at 278-280 Salem Street Woburn, in relation to the Wells G & H Superfund Site. (This request is directed to William Boutwell)

Dear Mr Renton:

The United States Environmental Protection Agency (EPA) is investigating the release or threatened release of hazardous substances, pollutant or contaminants, or hazardous wastes at the Wells G & H Superfund Site in Woburn, Massachusetts (the "Site"). This investigation includes an inquiry into the identification, nature, source, and quantity of materials transported to the Site and/or generated, treated, stored, or disposed of at the Site. This letter seeks your cooperation in providing information and documents relating to the environmental conditions at, and cleanup of, the Site. This request focuses specifically on the portion of the Site known as the Southwest Properties (see Enclosure D). The former Aborjona Auto Parts, Inc. facility, 278-280 Salem Street Woburn, is located within the Southwest Properties.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(e), you are hereby requested to respond to the Information Request set forth in the Enclosure to this letter.

While EPA seeks your voluntary cooperation in this investigation, compliance with the Information Request is required by law. Failure to provide a complete truthful response to this Information Request **within thirty (30) days** of your receipt of this letter, or to adequately justify such failure to respond, may subject you to an enforcement action by EPA pursuant to Section 104(e) of CERCLA. This provision permits EPA to seek the imposition of penalties of up to Thirty-two thousand five hundred dollars (\$32,500) for each day of non-compliance.

CONCURRENCES

| Please note that responses which are incomplete, ambiguous, or evasive will be treated as complete non-compliance with this Information Request. Also, be further advised that provision | | | | | |
|--|-------------|-----------|--|--|--|
| SYMBOL | 11103 | | | | |
| SURNAME | M. Boutwell | M. Marzke | | | |
| DATE | 4/14/05 | 4/14/05 | | | |

OFFICIAL FILE COPY

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
EPA NEW ENGLAND
1 CONGRESS STREET, SUITE 1100
BOSTON, MA 02114-2023

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Please note that responses which are incomplete, ambiguous, or evasive will be treated as complete non-compliance with this Information Request. Also, be further advised that provision

of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et seq. Your response to this Information Request should be mailed to:

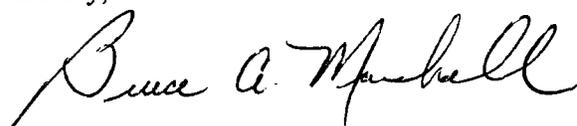
U.S. Environmental Protection Agency
Martha Bosworth, Enforcement Coordinator
Office of Site Remediation and Restoration (HBS)
One Congress Street, Suite 1100
Boston, MA 02114

ATTN: Wells G&H Case Team

If you have questions concerning the this Information Request, you may contact Martha Bosworth, Enforcement Coordinator at 617-918-1407. Technical questions concerning the Site should be referred to Joseph LeMay, the Remedial Project Manager at 617-918-1323. If you have legal questions, or if your attorney wishes to communicate with EPA on your behalf, please contact Susan Scott, Enforcement Counsel, U. S. Environmental Protection Agency, Office of Environmental Stewardship, 1 Congress St. (SES), Boston, MA 02114-2023, or at 617-918-1778.

Due to the seriousness of the problem at the Site and the legal ramifications of your failure to respond properly, EPA strongly encourages you to give this matter your immediate attention and to respond to this Information Request within the time specified above. Thank you for your cooperation in this matter.

Sincerely,



Bruce A. Marshall, Chief
Search and Cost Recovery Section, Technical & Support Branch
Office of Site Remediation and Restoration

Enclosures
Information Request Questions
Information Request Instructions
Information Request Definitions
Site Description
Site Map
Declaration

WELLS G & H
ENCLOSURE A - INFORMATION REQUEST QUESTIONS

* * * * *
* Period Being Investigated: 1950 to Present *
* * * * *

In addition to the questions which follow in this enclosure (Enclosure A), this letter includes detailed Instructions for responding to this request (Enclosure B), Definitions of words such as "Respondent," "identify," and "waste" used in the questions (Enclosure C), a Site Description (Enclosure D), Map (Enclosure E) and a Declaration (Enclosure F). These enclosures appear at the end of the questions; please refer to them in answering all questions. Of particular importance:

- Answer each question with respect to the period being investigated (noted above) unless the question indicates otherwise.
- Answer all questions completely in accordance with the definitions and instructions.
- For each question, identify all persons and documents consulted in the preparation of the answer and provide copies of all those documents.
- All information provided for which you are making a claim of business confidentiality should be contained on separate sheets and clearly marked as CONFIDENTIAL.
- All personal information, the release of which would constitute an unwarranted invasion of privacy, should be contained on separate sheets and clearly marked as PRIVACY MATERIAL.
- This request imposes a continuing obligation upon you to submit responsive information discovered after your original response is submitted to EPA.
- Complete the enclosed declaration (Enclosure F).

INFORMATION REQUEST QUESTIONS

Ownership of Cliff Boutwell's Aberjona Auto Parts, Inc.

1. Describe the nature of your ownership of Cliff Boutwell's Aberjona Auto Parts, including:
 - a. the date that you became a co-owner of the company;
 - b. your responsibilities as part owner;
 - c. the date that you became the 100% owner/shareholder of the business;
 - d. a description of your responsibilities as 100% owner of the business; and
 - e. copies of all agreements and other information documenting or related to your ownership interests.
2. In a 1994 Annual Report Grace P. Morse is identified as the Clerk of Cliff Boutwell's Aberjona Auto Parts, Inc. Describe the nature of Ms. Morse's involvement in the operation of Cliff Boutwell's Aberjona Auto Parts, Inc.
3. Explain why Cliff Boutwell's Aberjona Auto Parts, Inc. was dissolved in 1998. Identify the individual(s) who was in charge of business operations at the time of dissolution.
4. Describe how the assets of Cliff Boutwell's Aberjona Auto Parts, Inc. were distributed after dissolution, including:
 - a. the name of each individual or other entity receiving a portion of the assets and a description of the assets received by each; and
 - b. the current location of any remaining assets.
5. Provide copies of the 1997 and 1998 Federal and State business income tax returns and financial statements for Cliff Boutwell's Aberjona Auto Parts, Inc. If you do not have copies of these forms, sign the enclosed Form 4506 release so EPA can obtain copies of these tax returns and financial statements.
6. Identify the dates during which Michael Boutwell operated Aberjona Auto Parts, Inc. Provide the current address and phone number for Michael Boutwell.
7. Describe the relationship between the Aberjona Auto Parts, Inc. operated by Michael Boutwell and Cliff Boutwell's Aberjona Auto Parts, Inc. operated by you and Clifford C. Boutwell.
8. Describe how the proceeds from the sale of 278-280 Salem Street were distributed, including:

- a. the names and addresses of each individual or other entity receiving a portion of these sale proceeds and the percentage of the sale proceeds each received;
- b. the name and date of establishment of any trust that received a portion of these sale proceeds and the percentage of the sale proceeds received by each trust;
- c. the individuals identified as Trustees and beneficiaries of any of the trusts identified above; and
- d. provide copies of the trust documents.

Operation of Cliff Boutwell's Aberjona Auto Parts, Inc.

1. Describe the drums, if any, that Cliff Boutwell's Aberjona Auto Parts, Inc. sent to Whitney Barrel Company, Inc. for recycling/reclamation, including:
 - a. the time period during which drums were sent;
 - b. the types of drums sent;
 - c. the names and chemical composition of the materials stored in the drums;
 - d. the quantity of materials contained in the drums;
 - e. the quantity of drums of each material sent; and
 - f. information on any labels included on the drums.
2. Describe the drums, if any, that Cliff Boutwell's Aberjona Auto Parts, Inc. sent to Murphy's Waste Oil Service, Inc. for processing, including:
 - a. the time period during which drums were sent;
 - b. the types of drums sent;
 - c. the names and chemical composition of the materials stored in the drums;
 - d. the quantity of materials contained in the drums;
 - e. the quantity of drums of each material sent; and
 - f. information on any labels included on the drums.
3. Identify any other drum/barrel processing and/or recycling facilities that Cliff Boutwell's Aberjona Auto Parts, Inc. sent drums to, including:
 - a. the name and address of each facility;
 - b. the types of drums/materials sent to each facility (including the chemical composition of each material);
 - c. the quantity of materials contained in the drums;
 - d. the quantity of drums of each material sent to each facility; and
 - e. information on any labels included on the drums.
4. Describe the procedure for processing vehicles accepted at the facility, including:
 - a. the types of fluids drained from the vehicles and the area(s) where these fluids

- were drained from the vehicles;
 - b. the area(s) of the facility where each fluid was collected/stored;
 - c. the ultimate disposal location for each fluid, including the name of the transporter(s) used to haul each fluid;
 - d. the area(s) where the vehicles were stored at the facility prior to and following processing; and
 - e. provide copies of all documents that provide information and/or reference the acceptance of vehicles at the facility.
5. Identify the individuals, including former employees, who were responsible for processing the vehicles that were accepted at the facility.
6. Describe the procedures for cleaning parts and equipment for resale, or for other purposes, at the facility, including:
- a. the area(s) of the facility where parts and equipment were removed from the vehicles;
 - b. the area(s) of the facility where parts and equipment were cleaned;
 - c. the number and type of parts washer stations used (i.e., electric or manual pump; baths; rags or brushes used to clean parts);
 - d. the names and chemical composition of each material used to clean the parts and equipment;
 - e. the time periods during which each cleaning solution or material was used at the facility;
 - f. the names and addresses of the vendors for each material;
 - g. the area(s) where each material was stored at the facility (as a raw material);
 - h. how and where spent solutions were collected and stored at the facility prior to disposal;
 - i. how each material was disposed of, including the name(s) of the transporter(s) and final disposal location(s) for each material;
 - j. the names of any spent cleaning solutions or materials that were placed in floor drains, the septic or sewer system, on an evaporation pad, or disposed of on the ground surface (including drainage trenches) and the frequency of each type of disposal;
 - k. the employees or other individuals who were responsible for cleaning the parts and equipment, including each individual's responsibilities and the time periods each individual was responsible for those operations; and
 - l. provide copies of all documents that provide information and/or reference these part and equipment cleaning operations.

Grace E. Boutwell Revocable Trust

1. Describe the terms of the Grace E. Boutwell Revocable Trust of January 26, 1990

("Trust"). Identify the Trustees and beneficiaries of this Trust. Identify all the property included in this Trust. Provide a copy of the Trust.

2. Describe the revocation of the Trust, if any, including:
 - a. the date the Trust was revoked;
 - b. how the assets of the Trust were distributed; and
 - c. the current location and value of each asset.

Other Businesses

1. Describe the nature of Imports Unlimited, Inc.'s operations, including:
 - a. the dates during which this business operated;
 - b. the dates during which this business operated at 280 Salem Street, Woburn, MA, the specific area(s) of the facility where the business operated, and the operations that took place in each of these areas;
 - c. any other locations where the business operated and the dates the business operated at each location;
 - d. the number of employees the business had;
 - e. the names, addresses, and dates of employment for each employee;
 - f. the names, addresses, and dates of service of all directors and officers;
 - g. the raw materials that were used in the operations;
 - h. the procedures and materials used to clean and maintain any equipment and machinery;
 - i. the wastes, if any, generated by the business operations; and
 - j. the method of collecting and disposing of each waste, including the names of all waste transporters and the location of final disposal for each waste.
2. Provide copies of any leases concerning Import Unlimited, Inc.'s operations at the facility.
3. Identify all persons who had ownership interests in Imports Unlimited, Inc. and the amount of ownership each person held.
4. Provide copies of the 1989 and 1990 Federal and State business income tax returns and financial statements for Imports Unlimited, Inc. If you do not have copies of these forms sign the enclosed Form 4506 release so EPA can obtain copies of the tax returns and financial statements.
5. Please describe the corporate or business relationship between Imports Unlimited, Inc. and Cliff Boutwell's Aberjona Auto Parts, Inc.

General Questions

1. If you have information concerning operations of Aberjona Auto Parts, Inc., Cliff Boutwell's Aberjona Auto Parts, Inc., or other business operations at the facility, or the source, content, or quantity of materials placed/disposed of at the facility which is not included in the information you have already provided, provide all such information.
2. If not already included in your response, if you have reason to believe that there may be persons, including persons currently or formerly employed by you, Clifford C. Boutwell, or Michael Boutwell, who are able to provide a more detailed or complete response to any of these questions or who may be able to provide additional responsive information or documents, identify such persons and the additional information or documents that they may have.
3. If not already provided, identify all persons, including your current and former employees, or the current and former employees of Clifford C. Boutwell and Michael Boutwell, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal, placement or other handling of materials at, or transportation of materials to, 278-280 Salem Street, Woburn, MA.
4. Describe all sources reviewed or consulted in responding to this request, including but not limited to:
 - a. the names of, and contact information for, all individuals consulted;
 - b. the current job title and job description of each individual consulted;
 - c. the job title and job description during the period being investigated for each individual consulted;
 - d. whether each individual consulted is a current or past employee of yours, Clifford C. Boutwell, or Michael Boutwell;
 - e. the names of all companies, divisions or offices for you, Clifford C. Boutwell, and Michael Boutwell for which records were reviewed;
 - f. the nature of all documents reviewed;
 - g. the locations where those documents reviewed were kept prior to review; and
 - h. the location where those documents reviewed are currently kept.

WELLS G & H

ENCLOSURE B - INSTRUCTIONS

1. Answer Every Question Completely. You are required to provide a separate answer to each and every question and subpart of a question set forth in this Information Request. Incomplete, evasive, or ambiguous answers shall constitute failure to respond to this Information Request and may subject you to the penalties set out in the cover letter.
2. Number Each Answer. Number each answer with the number of the question to which it corresponds.
3. Provide Information about the Period Being Investigated. You are required to answer each question with respect to the period being investigated. If the response fails to address the period being investigated, EPA will consider this a failure to comply with the request and may take action against you for this noncompliance.
4. Provide the Best Information Available. You must provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered non-compliance with this Information Request.
5. Identify Sources of Answer. For each question, identify (see Definitions) all the persons and documents that you relied on in the preparation of your answer.
6. All Documents Must be Labeled. For each document submitted in response to this Information Request, indicate on the document (or in some other reasonable manner) the number of the question to which it responds.
7. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that you supplement your response to EPA. Failure to supplement your response within 30 days of discovering such responsive information may subject you to \$27,500 per day penalties. If at any time after the submission of this response, you discover or believe that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. If any part of the response to this Information Request is found to be false, the signatory to the response and the company may be subject to criminal prosecution.
8. Complete the Enclosed Declaration. You are required to complete the enclosed declaration which certifies that the information you are providing in response to this Information Request is true, accurate, and complete.
9. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a

confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§ 9604(e)(7)(E) and (F), and 40 C.F.R. § 2.203(b). All information claimed to be confidential should be contained on separate sheet(s) and should be clearly identified as "trade secret" or "proprietary" or "company confidential." In addition, please note that you bear the burden of substantiating your confidentiality claim. Your claim of confidentiality should be supported by the submission of information supporting such a claim; the type of information to be submitted is set out in 40 C.F.R. Part 2. Information covered by a claim of confidentiality will be disclosed by EPA only to the extent, and only by means of the procedures, provided in 40 C.F.R. §§ 2.201-2.311. **If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you.** You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

10. Objections to Questions. While the Respondent may indicate that it objects to certain questions in this Information Request, it must provide responsive information notwithstanding those objections. To object without providing responsive information may subject Respondent to the penalties set out in the cover letter.

11. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information." You should note however, that unless prohibited by law, EPA may disclose this information to the general public without further notice to you.

12. Claims of Privilege.

(a) If you claim any document responsive to this Information Request is a communication for which you assert a privilege exists for the entire document, identify (see Definitions) the document and provide the basis for asserting the privilege.

(b) If you claim any document responsive to this Information Request is a communication for which you assert a privilege exists for a portion of the document, identify the portion of the document for which you are asserting the privilege, and provide the basis for the assertion.

Please note that regardless of the assertion of any privilege, any facts contained in the document which are responsive to the Information Request must be disclosed in your response.

13. Disclosure to EPA Contractor. Information which you submit in response to this Information Request will be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. 2.310(h), even if you assert that all or part of it is confidential business information. Please be advised that EPA intends to disclose all responses to this Information Request to one or more of its private contractors, listed below, for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If you are submitting information which you assert is entitled to treatment as confidential business information, you may comment on this intended disclosure within fourteen (14) days of receiving this Information Request.

EPA CONTRACTOR LIST

Updated March 24, 2005

CONTRACTOR

CONTRACT NUMBER

Arctic Slope Regional Corp.(ASRC) Aerospace
Effective: 9/5/02

Contract No.: 68-R1-02-01

Booz, Allen & Hamilton
Effective: 01/01/04
Effective: 12/30/98

EPA IAG No. DW47940245
GSA ANSWER Contract No.: GS09K99BHD0002

TechLaw, Inc.
Effective: Effective July 12, 1999

GSA Contract No.: GS-10F-0168J

James Kerr and Associates, LLC
Effective 9/04/2003

WELLS G & H

ENCLOSURE C - DEFINITIONS

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, 42 U.S.C. Section 9601 et seq., RCRA, 42 U.S.C. Section 6901 et seq., or Volume 40 of the Code of Federal Regulations (CFR), in which case such statutory or regulatory definitions shall apply.

The following definitions shall apply to the following words as they appear in this Enclosure:

1. The term "you" shall mean William E. Boutwell in the following capacities:
 - a. Executor of the Will of Grace E. Boutwell;
 - b. Trustee of the Grace E. Boutwell Revocable Trust of January 26, 1990;
 - c. Beneficiary of the Estate of Grace E. Boutwell;
 - d. Beneficiary of the Grace E. Boutwell Revocable Trust of January 26, 1990;
 - e. Incorporator of Cliff Boutwell's Aberjona Auto Parts, Inc.;
 - f. Director/Officer of Cliff Boutwell's Aberjona Auto Parts, Inc.;
 - g. Owner and sole shareholder of Cliff Boutwell's Aberjona Auto Parts, Inc.; and
 - h. Director/Officer and shareholder of Imports Unlimited, Inc., Massachusetts Automotive Compensation Corporation, and All Service Auto Parts, Inc.

2. The terms "document" and "documents" shall mean any method of recording, storing, or transmitting information. "Document" shall include but not be limited to:
 - (a) writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including (by way of illustration and not by way of limitation) any of the following:
 - (1) invoice, receipt, endorsement, check, bank draft, cancelled check, deposit slip, withdrawal slip, order;
 - (2) letter, correspondence, fax, telegram, telex;
 - (3) minutes, memorandum of meetings and telephone and other conversations, telephone messages;
 - (4) agreement, contract, and the like;
 - (5) log book, diary, calendar, desk pad, journal;
 - (6) bulletin, circular, form, pamphlet, statement;
 - (7) report, notice, analysis, notebook;
 - (8) graph or chart; or
 - (9) copy of any document.
 - (b) microfilm or other film record, photograph, or sound recording on any type of device;
 - (c) any tape, disc, or other type of memory generally associated with computers and data processing, together with:

- (1) the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory; and
 - (2) printouts of such punch card, disc, or disc pack, tape or other type of memory; and
 - (d) attachments to or enclosures with any document as well as any document referred to in any other document.
3. The term "identify" or "provide the identity of" means, with respect to a natural person, to set forth:
- (a) the person's full name,
 - (b) present or last known business and home addresses and telephone numbers;
 - (c) present or last known employer (include full name and address) with job title, position or business; and
 - (d) the person's social security number.
4. The term "identify" or "provide the identity of" means, with respect to a corporation, partnership, business trust, government office or division, or other entity (including a sole proprietorship), to set forth:
- (a) its full name;
 - (b) complete street address;
 - (c) legal form (e.g. corporation, partnership, etc.);
 - (d) the state under whose laws entity was organized; and
 - (e) a brief description of its business.
5. The term "identify" or "provide the identity of" means, with respect to a document, to provide:
- (a) its customary business description (e.g., letter, invoice);
 - (b) its date;
 - (c) its number if any (e.g., invoice or purchase order number);
 - (d) the identity of the author, addressor, addressee and/or recipient; and
 - (e) a summary of the substance or the subject matter. Alternatively, Respondent may provide a copy of the document.
6. The terms "the period being investigated" and "the relevant time period" shall mean the period being investigated as specified on the first page of the Information Request Questions unless otherwise defined in the Information Request Questions.
- 7 The term "facility" shall mean the land and buildings located at 278-280 Salem Street, Woburn, MA.
8. The term "material" or "materials" shall mean any and all objects, goods, substances, or matter of any kind, including but not limited to wastes.
9. The term "waste" or "wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid,

liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.

10. The term "Cliff Boutwell's Aberjona Auto Parts, Inc." shall mean the business incorporated as "Cliff Boutwell's Aberjona Auto Parts, Inc." on November 23, 1966 in Massachusetts, FEIN 042400877 and shall include all owners and operators of this business, including but not limited to, Clifford C. Boutwell and William E. Boutwell.

11. The term "Aberjona Auto Parts, Inc." shall mean the business incorporated as "Aberjona Auto Parts, Inc." on July 10, 1997, FEIN 043378391 and shall include any operations conducted under FEIN 000582117 and all owners and operators of this business, including but not limited to, Michael Boutwell.

12. The term "Whitney Barrel Company, Inc." shall mean the land and buildings located at 256 Salem Street under ownership and or management of all owners, operators, and lessees of the facility since 1950.

13. The term "Murphy's Waste Oil Service, Inc." shall mean all the land and buildings located at 250 Salem Street; 252 and 252R Salem Street, under ownership and or management of all owners, operators, and lessees from 1919 to the present.

WELLS G & H

ENCLOSURE D - SITE DESCRIPTION

Wells G & H were two municipal wells developed in 1964 and 1967 to supplement the water supply of the City of Woburn. The wells supplied 30 percent of the city's drinking water. The population of the City of Woburn is approximately 36,000 people.

In 1979, city police discovered several 55-gallon drums of industrial waste abandoned on a vacant lot in the vicinity of the site; these drums subsequently were removed. As a result of this finding, the nearby wells were tested and found to be contaminated. Both of these wells were shut down in 1979. Five separate properties were found to be the contributing sources of contamination to the aquifer that supplied the water to the two municipal wells. The Wells G & H site covers a total area of 330 acres which encompass commercial and industrial parks, recreational and residential areas in East Woburn. The site is bounded by Route 128 to the north, Route 93 to the east, the Boston and Maine Railroad to the west, and Salem Street and Cedar Street to the south. The area surrounding the site is predominantly residential. The Aberjona River flows through the middle of the site. Primary contaminants include volatile organic compounds including trichloroethylene (TCE) and tetrachloroethylene (PCE), polycyclic aromatic hydrocarbons (PAHs) and heavy metals.

The Southwest Properties are located in the Aberjona River Valley in the southwestern corner of the Wells G&H Superfund Site. Similar to many agriculturally and commercially developed valleys in New England, the Aberjona River Valley (including the Southwest Properties) was attractive to development because it has a relatively low topographic relief, is easily constructed upon, and is underlain by a valley-fill aquifer that is capable of supplying large quantities of water. As such, the Aberjona River Valley has a long history of industrial uses. The valley also has a lengthy agricultural history.

The primary identified site contaminants in soils, sediments, and groundwater across the Southwest Properties include the following constituents, broken down by contaminant type. These include:

VOCs, including benzene, petroleum hydrocarbons, methyl tertiary butyl ether, tetrachloroethene, trichloroethene, and vinyl chloride;

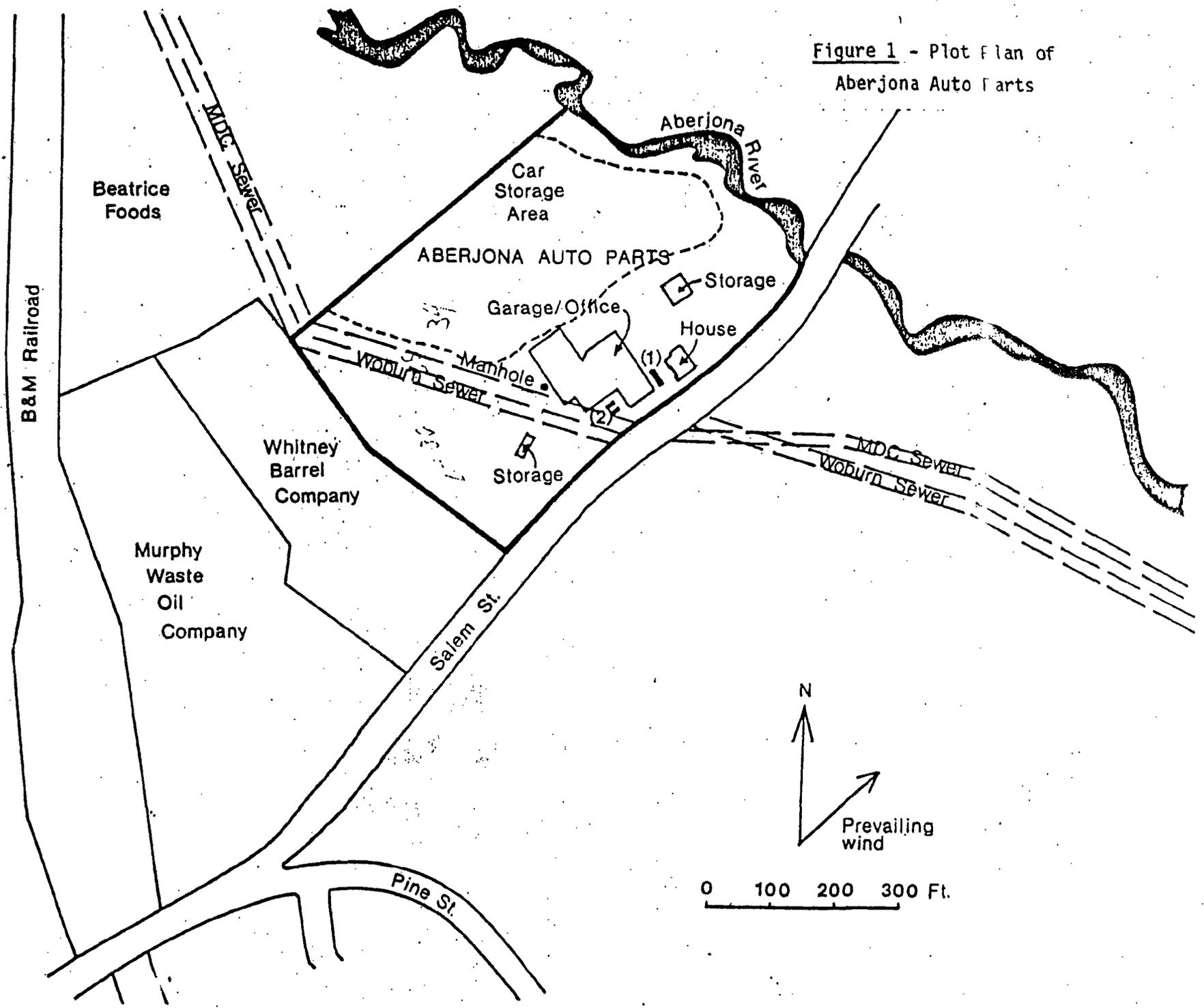
Semivolatile organic compounds, including benzo(a)anthracene, and benzo(a)pyrene;

Pesticides, such as alpha-chlordane and gamma chlordane;

PCB Aroclors, such as 2,3',4,4'5-PentCB(118) and 3,3'4,4'5,-PentaCB(126); and

Metals, including arsenic, cadmium, chromium, and lead.

Figure 1 - Plot Plan of Aberjona Auto Parts



WELLS G & H

ENCLOSURE F - DECLARATION

I declare under penalty of perjury that I am authorized to

respond on behalf of _____ and that the
Respondent

foregoing is complete, true, and correct.

Executed on _____, 2__

Signature

Type Name

Title [if any]

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Gilbert & Renton
23 Main Street
Andover MA 01810

*William
Butwell*

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1 Article Addressed to:

Jeffrey Renton, Esquire
Gilbert & Renton
23 Main Street
Andover MA 01810

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| | |
|--|--|
| A. Received by (Please Print Clearly) <i>Jamie Pawel</i> | B. Date of Delivery <i>4/18/05</i> |
| C. Signature <i>X Jamie Pawel</i> | <input type="checkbox"/> Agent <input type="checkbox"/> Addressee |
| D. Is delivery address different from item 1? If so, print address below: | <input type="checkbox"/> Yes <input type="checkbox"/> No |

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