

DRAFT AGENDA

Thursday January 20, 2022

8:00 a.m. to 10:00 a.m.

via Zoom

To listen/view this meeting, download the "Zoom Cloud Meeting" app in any app store or at www.zoom.us. At the above date and time, click on "Join a Meeting" and enter the meeting ID **899 3988 8562** and passcode **962411** or click the link below to register: <https://us02web.zoom.us/j/89939888562?pwd=WFZDTmllQ2t1aRTGvaTlVNXhRbCswUT09>

- **8:00 to 8:05 – Welcome & Review of Minutes (December 14th, January 5th)**
- **8:05 to 8:30 – Staff Reports (December)**
- **8:30 to 9:00 – COVID-19 Update**
 - **Vaccination Efforts**
 - **Update on Center for COVID Control**
 - **Mask Policy & Letter from Charles River Regional Chamber**
- **9:00 to 9:15 – Sira Naturals Request for Modifications to Permit/Regulations**
- **9:15 to 9:30 – Hungry Coyote Restaurant Compliance Issues**
- **9:30 to 9:40 – #1688 Central Avenue and Licensed Site Professional Scope**
- **9:40 to 9:45 – Brewery Concept - Amy Haelsen, Econ. Development Manager**
- **9:45 to 9:50 – Alcohol Compliance Checks and TIPS Training**
- **9:50 to 10:00 – Synthetic Field Turf Testing & Results**
- **Topics for Upcoming BOH Meetings**
 - *Status Update on BOH FY 21-22 Goals*
 - *Discussion on NEW 314 CMR 16.00: Notification Requirements to Promote Public Awareness of Sewage Pollution/Combined Sewer Overflow Notifications*
- **Next BOH meetings**
 - **Regular Monthly Meeting** **February 10, 2022** **5:00 p.m.**
- **Adjournment**

(Please note that all times are approximate)



NEEDHAM PUBLIC HEALTH DIVISION



Board of Health Meeting Minutes DRAFT

Date: December 14, 2021

Location: Remote via Zoom per Governor Charles Baker's COVID-19 Executive Order 3/12/2020 and amended as of 6/15/2021

Members: Robert A. Partridge, MD, MPH, Chair
Christina S. Mathews, MPH, Vice Chair
Edward Cosgrove, PhD, Member
Stephen Epstein, MD, MPP, Member
Kathleen Ward Brown, ScD, Member

Staff Present: Tara Gurge, Assistant Director of Public Health; Tiffany Zike, Assistant Director of Public Health; Mary Fountaine; Julie McCarthy; Carol Read; Michael Lethin; and Diana Acosta

Call to Order

Dr. Partridge called the meeting to order at 7:00PM and initiated roll call. Present were Dr. Partridge-Y, Dr. Brown-Y, Dr. Cosgrove-Y, Dr. Epstein-Y and Ms. Mathews-Y.

The meeting is being conducted in-person and remotely using Zoom consistent with Governor Baker's March 12th executive order and as amended on June 15, 2021, regarding COVID-19. The materials for this meeting were circulated previously and are available on the Town website. This meeting is being recorded.

Approval of Minutes – November 16, 2021

Upon motion duly made by Dr. Partridge and seconded by Ms. Mathews, it was voted to approve the above minutes as amended. Dr. Brown-Y, Dr. Epstein-Y, Dr. Cosgrove-Y, Dr. Partridge-A and Ms. Mathews-Y. Motion passed 4-0-1 with Dr. Partridge abstaining.

Staff Reports

Environmental Health – Tara Gurge, Diana Acosta and Monica Pancare

Ms. Gurge reported that the new part-time health agent, Sheri Miller-Bedau, started on Monday, December 6th. Ms. Miller-Bedau will work five hours per week in December conducting food inspections and will increase to ten hours per week in January.

Ms. Gurge also reported that Ms. Acosta organized and held three well-attended virtual food safety trainings with Lisa Berger of Berger Food Safety. After the series was completed, recordings of the session were posted on the Health Division website so restaurants can share the trainings with their



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employees. An application to the FDA-NEHA for a retail flexible funding model grant was filed and awaiting notice.

Ms. Acosta reported that three memoranda of understanding were issued to The Rice Barn, Masala Art and the Hungry Coyote, and these restaurants have been put on administrative watch for repeat violations of unsafe and unsanitary conditions. Pest control was an issue and they have been asked to submit contact information for the pest control companies directly. They are also required to keep cleaning logs and submit them weekly to the department. The Hungry Coyote owner was required to retrain staff, and there was a question as to whether a staff member had actually been trained. The Environmental Health team is following up with the training proctor to clarify how the exam was administered. The Board agreed that strict compliance should be enforced.

Ms. Acosta reported that she continues to issue annual permit renewals and is contacting those establishments that have not yet submitted requests.

Ms. Acosta also reported that the Housing Authority had reported that they were in the process of hiring contractors to add gutters to the homes with moisture complaints. The Housing Authority was advised earlier that there is no definitive test for the presence of mold as the state has no set standard.

Substance Use Prevention – Dr. Brown for Karen Shannon,

In Ms. Shannon's absence, Dr. Brown reported that at the Peer Leadership Conference held at Gillette Stadium, Norfolk County District Attorney Michael Morrissey awarded SALSA students \$1,500 for their success in the Team Rival competition. This is the sixth straight year the Needham High School youth have been recognized for their work.

Ms. Shannon and her team had also completed eleven alcohol compliance checks, and of that number five did not ask for identification. Dr. Brown noted this is an ongoing issue as 30% of high school students report alcohol use and 50% of seniors. The Board will make efforts to connect with the Select Board on ways to enforce vendor alcohol compliance.

Travelling Meals – Maryanne Dinell

Ms. Dinell reported that the Community Council, Rotary Club and Needham Golf Club had distributed fifty-three meals to participants on the Travelling Meals Program and another three-hundred meals to other Needham residents. She noted that there has been a decrease in participation, partly due to the increase of alternative food delivery options available post-COVID. The program, however, remains a lifeline for those homebound seniors who receive a meal and a daily wellness check-in.

Ms. Dinell announced her retirement in February, and the Board expressed gratitude for her twenty-eight years of dedicated service.

Emergency Management Support – Taleb Abdelrahim and Michael Lethin

Mr. Lethin reported that an Emergency Operations Center (EOC) communications drill had been successfully conducted to validate standard operating procedures to use RAVE Alert to recall EOC



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staff outside of normal duty hours. Separate from the drill, the Massachusetts Emergency Management Authority (MEMA) had responded to requests for personal protective equipment. Mr. Lethin also reported that he received a notice to proceed on the Emergency Management Performance grant contract and a new application for a Hazardous Materials Emergency Performance Grant has been submitted and notice of approval is expected by the end of the month.

Public Health Nursing –Mary Fountaine and Tiffany Zike

Ms. Fountaine reported that COVID vaccinations are available in clinics by appointment. Flu vaccinations are also available by appointment. The nurses ran two second-dose pediatric vaccination clinics.

Ms. Fountaine also reported that three contact tracers have been hired, two of which will work under the shared grant with Medfield and Dover, and the third will work exclusively with Needham. All three have received their logins with the state MAVEN system. Ms. Burnett is also working on concussion protocols.

Ms. Fountaine also reported that the first Naloxone education program is scheduled for December 20th with additional programs to be offered. This thirty-minute class educates the consumer on when and how to use Narcan in the event of an opioid overdose. The Board agreed that this was a more suitable hands-on training than the pharmacies could provide.

Ms. Read announced the hiring of Ellisa Dockstader, a graduate student at Boston University School of Public Health. She has previously worked in Utah providing pandemic-related services. She will work on the grant for 19.5 hours per week.

Ms. Read also reported that she had reached out to the Norfolk County Commissioners with regard to the \$137 million allocated in ARPA funds. A portal has been set up for municipalities to apply for grant funds.

COVID-19 Update – Tiffany Zike and Julie McCarthy

Ms. McCarthy reviewed the Covid-19 data as of November including prevalence, demographics, breakthrough cases, and vaccination levels. See attached PowerPoint presentation for detailed information.

Covid-19 update
Incidence rate and percent positivity
Case demographics
Vaccination status
Breakthrough cases
Breakthrough cases in Massachusetts
Unvaccinated cases
Cluster and household transmission



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Vaccinations
Deaths
School contacts
School contacts vaccination status
State trends in cases and hospitalizations
Massachusetts cases by age
MA hospitalization rates by age
MA hospitalizations among children

Ms. Zike noted that 1.1% of the vaccinated population had breakthrough cases. Dr. Epstein noted the need to know the percentage rate of cases for those not vaccinated. Ms. Zike also reported on the number of vaccinations administered and plans for administering booster vaccinations. She also reported that the state had changed its protocol for contact tracing, changing from one-on-one tracing to multiple contacts of colleges, congregate care facilities, daycare and other high-risk settings.

Discussion of Tobacco Free Generation Policy

Dr. Epstein reported that Brookline Town Meeting had voted (62% in favor, 35%, 3% abstain) legislation that stated if you were born after January 1, 2000, there would be no tobacco sales. He added that this phased prohibition over a number of years could see a generation grow up without the use of tobacco.

Discussion ensued on the positives and negatives of this legislation. Although it makes scientific sense that the frontal lobe of the brain is not fully mature until age twenty-five and therefore the ability to make sound decisions, enforcement of this legislation for an adult seeking to buy a legal product would be difficult. Both Hawaii and New Zealand are considering prohibiting tobacco sales before age twenty-five only.

Regulation of smoking also addresses the societal impacts of smoking, especially the exposure to second-hand smoking for vulnerable children. It was agreed that Dr. Epstein would contact Brookline for feedback on how support of residents was garnered to get behind this legislation. In the meantime, the Board will continue to phase out tobacco sales permits.

Decriminalization of Controlled Substances

Michah Bernat appeared before the Board. He is a Needham resident and a student at the University of Vermont. He stated that he is involved in two student organizations, the Psychedelic Science Club and the Students for Sensible Drug Policy, that assisted in the passing of a resolution in Burlington, Vermont to decriminalize controlled substances. He added that Boston will pass similar legislation in January and Newton is considering the resolution.

He noted that the Board is on the forefront of tobacco and alcohol safety and he asked that the Board support the resolution to decriminalize controlled substances, thereby promoting safety and reduction of harm from the stigma of substance abuse.



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Mr. Bernat will follow-up by providing the language of the resolution and supporting information for the Board's further discussion.

Continued Discussion of #1688 Central Avenue proposed Day Care – Citizens Comments

Holly Clark appeared before the Board. She stated that a red flag was raised when the seller of the property did not permit buyers to conduct due diligence on the environmental status of the site. Another was raised when the plan to construct a septic system was abandoned for sewer line from the street. She added that this property was not a single-family home but functionally operated for over fifty years as an auto junk yard and as a repository for an excavation company and its debris and machines. She displayed pictures taken of the site that show years of piles of debris, oil barrels and other salvage.

Other residents appeared before the Board: Kristy Thompson, Maggie and Joe Abruzese, Pat Day, Carole Siellio, Carolyn Reubach, Greg Parise and made following comments:

- Developer contracted with unlicensed person to do testing.
- No publicly available reports to indicate what is in the soil.
- Spread of six to twelve inches of loam over property is not sufficient.
- Developer recently excavated the site and brought in additional fill without supervision.
- Test the soil for lead and other toxins.
- Need for independent licensed professional to guide the town in supervision of this project.
- Extra level of security is needed because of the intended use of daycare.
- Auto salvage yards are tightly regulated by the state to not be within 300 ft of a daycare.
- This property is more than 300 ft to the abutting Temple playground.
- Motivation to object is driven by what is best for vulnerable children.

Richard Wozmak appeared before the Board. He stated that the entire area the children will occupy will be capped in order to eliminate exposure to anything that may be in the soil. This cap will prevent exposure of dust, soil, inhalation of dust or skin contact. The playground area in particular will receive a high intensity cap with a demarcation barrier. This cap is unlike the cap used for landfills as it allows rainfall to eliminate exposure pathways.

Board of Health Discussion and Recommendation to Planning Board of #1688 Central Avenue Project

Ms. Mathews thanked all participants for their input. She acknowledged that more information has come forth about the condition of the property and the current usage. She was alarmed that excavation and addition of fill had recently been done on the property.

The Board agreed that every precaution must be taken to mitigate health hazards especially to children. Testing by an independent evaluator who is qualified to do site assessment and make recommendations for appropriate mitigation should be done with consideration for the long term.



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Upon motion duly made by Dr. Epstein and seconded by Dr. Cosgrove, it was unanimously voted to recommend to the Planning Board that an independent evaluation of the property be conducted, and evaluation submitted for the purpose of determining whether or not testing is necessary or whether or not mitigation is proposed for the developer. Dr. Brown-Y, Dr. Cosgrove-Y, Dr. Epstein-Y, Dr. Partridge-Y and Ms. Mathews-Y. Motion carries 5-0.

Other:

Dr. Cosgrove suggested that, due to the increase in the Omicron variant, masks should be required in public buildings. Following discussion, it was agreed that Ms. Zike will make a recommendation to Town management that masking indoors be required.

Next Meetings

January 20, 2022 @ 9:00AM

February 10, 2022 @ 5:00PM

Adjournment

Upon motion duly made by Dr. Epstein and seconded by Dr. Cosgrove, it was unanimously voted to adjourn. Dr. Brown-Y, Dr. Cosgrove-Y, Dr. Epstein-Y, Dr. Partridge-Y and Ms. Mathews-Y. Motion passed 5-0. The meeting was adjourned at 7:17PM.

Attachment:

December 14, 2021 Meeting Packet



NEEDHAM PUBLIC HEALTH DIVISION



Board of Health Meeting Minutes DRAFT

Date: January 5, 2022

Location: Remote via Zoom per Governor Charles Baker's COVID-19 Executive Order 3/12/2020 and amended as of 6/15/2021

Members: Robert A. Partridge, MD, MPH, Chair
Christina S. Mathews, MPH, Vice Chair
Edward Cosgrove, PhD, Member
Stephen Epstein, MD, MPP, Member
Kathleen Ward Brown, ScD, Member

Staff Present: Timothy Muir McDonald, Health and Human Services Director; Tara Gurge, Assistant Director of the Public Health Division; Tiffany Zike, Assistant Director of Public Health; Julie McCarthy; and Diana Acosta

Call to Order

Dr. Partridge called the meeting to order at 6:00PM and initiated roll call. Present were Dr. Partridge-Y, Dr. Brown-Y, Dr. Cosgrove-Y, Dr. Epstein-Y and Ms. Mathews-Y.

The meeting is being conducted remotely using Zoom consistent with Governor Baker's March 12th executive order and as amended on June 15, 2021, regarding COVID-19. The materials for this meeting were circulated previously and are available on the Town website. This meeting is being recorded.

Mask Discussion

Dr. Partridge began the discussion on mask wearing. He asked Julie McCarthy to share the most recent data on COVID-19. Ms. McCarthy reviewed the PowerPoint presentation including the following highlights:

- 14-Day average percent positivity – 5.35% up from previously reported 2.99%.
- Incidence rate, percent positivity, vaccination rates.
- Needham daily case numbers (11/15/21-1/3/22) – dramatic increase.
- Needham December cases by age (12/1/21-1/3/22 – 728 cases in reported in MAVEN.
- Cases by vaccination status (12/1/21-1/3/22) – 2.5% of fully vaccinated infected.
- Massachusetts cases: sequencing – Delta 17%; Omicron 82% cases.
- Needham cases: sequencing – 7% from 44/644 as of 12/7; second half of month 13/17 Omicron. Massachusetts assumes cases after December 25th Omicron.
- State trends in cases and hospitalizations.



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- Massachusetts total cases vs. total deaths – deaths slower rate than rapid increase of cases.
- Massachusetts cases by age – upper trend in all age groups.
- Massachusetts hospitalization rates (per 100K) by age – increase in many age groups.
- Massachusetts deaths by age – fewer deaths by age category 60+.
- Breakthrough cases in fully vaccinated individuals 3.5%; under 0.08% hospitalized; 0.02% deaths.
- Breakthrough cases, hospitalizations and deaths.
- Vaccinated individuals in hospitals – increase from 28% to 35%.

Discussion ensued on mask mandates in neighboring towns. Dr. Partridge noted that he is seeing more hospitalizations of children than ever before, with some quite ill. While a town-wide mask mandate may not be needed, places, such as the library where children are present mandating masks would be appropriate.

Mr. McDonald noted that the directors of the library and the senior center expressed concern because their populations experience longer interactions in their environments. They requested the Board of Health mandate that masks be worn at all times in their buildings. Mr. McDonald added that a force majeure protection argument could be made for these spaces where people are in them for longer periods of time and not brief periods as in Town Hall to pay a bill, etc. Also, the senior center director expressed concern over some residents who may be immune-compromised and more vulnerable. Mr. McDonald added that he had not been contacted by the Town Manager or Select Board with regard to mandated wearing masks in municipal buildings, but will reach out to them to begin the conversation.

Dr. Cosgrove noted that because some seniors spend the greater part of their day at the senior center wearing masks would be appropriate. Dr. Epstein noted that cloth masks are no longer effective, and that surgical or KN95 masks would be the most effective. If the Board were to mandate masks, providing quality masks to clients would be most effective. Discussion ensued on funding available for these masks. Mr. McDonald will pursue funding options.

Dr. Epstein noted that wearing masks may create a false sense of security. While masks are not the panacea, data shows that the best protection is full vaccination followed by a booster shot. The data is showing that those boosted are less likely to be hospitalized or die. The objective is to get the remaining 50% of residents boosted. Dr. Epstein also noted that the Needham hospital is overwhelmed at this point and is drawing patients from Norwood residents as well. Anything that can be done to get residents boosted will deter the need for hospitalizations.

Discussion ensued on the current message at Town Hall that face masks are “welcome.” It was agreed that the message could reflect a more serious tone to state that individuals entering buildings should wear masks regardless of vaccination or health status.

Mr. McDonald noted that mandating of masks in municipal and public buildings would put additional pressure on staff to enforce. He added that he had not heard from businesses seeking the Town to mandate masks. Dr. Brown noted that mask wearing has a high social influence component and that



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mandating would not be as effective. It was agreed that mandating would create an enforcement issue on an already over-stretched staff.

Following discussion, Dr. Partridge made the motion to support the requests of the directors of the library and senior center to require masks in both facilities and to strongly recommend that masks be worn in all public municipal buildings.

Following further discussion, the motion was amended by Dr. Cosgrove and seconded by Dr. Epstein to support the requests of the directors of the library and senior center to require masks in both facilities and wherever programs are held for youth and seniors. Dr. Partridge-Y, Dr. Brown-Y, Dr. Cosgrove-Y, Dr. Epstein-Y and Ms. Mathews-Y. Motion carries 5-0, unanimous.

Discussion followed on the Board issuing an additional public message to the effect that the Board strongly recommends that all people wear masks, either surgical grade KN95 or better, to protect themselves and others while in all publicly accessible buildings and to get a booster shot as soon as possible. Ms. Zike reported that 400-500 booster shots are given at the clinic each week. Dr. Epstein noted that a 90% vaccination rate had been achieved before, and can now be achieved in boosters. Suggestions were made to get the message out on the website, newsletters and other public service announcements. Mr. McDonald will discuss with the Town Manager the best way to promulgate this dual message of mask wearing and getting booster shots.

Hearing on Summary Suspension Order Issued to Hungry Coyote Food Establishment 1185 Highland Avenue

Dr. Partridge opened the above hearing at 6:30PM. In attendance were Hungry Coyote owners, Francisco and Leona Mendez and Town Counsel, Christopher Heap.

Dr. Partridge stated that this hearing is to address ongoing food safety, health and sanitary issues of the Hungry Coyote as it presents a threat to the public health of the residents of the Town of Needham and others. As a result of a request for a hearing, this hearing is being held three business days after receipt of the written request, and the owner is invited to explain why the order should be withdrawn.

Mr. Mendez and Ms. Mendez appeared before the Board. Mr. Mendez said he has been managing restaurants for twenty-two years in Waltham, Brockton, Stoughton, and Needham for the last two years, and has been a Needham resident for the last thirteen years. He stated his food is 100% healthy, safe and delicious. Mr. Mendez said that for the past two and one-half weeks he has been doing "everything by the book" according to the Health Department's requests for temperature logs and cleaning logs, etc. He stated that no one is in danger of becoming sick from his restaurant.

In response to Dr. Epstein's question as to how long he has been managing restaurants, Mr. Mendez responded that he has been a manager for twenty-two years fulfilling multiple roles cooking in the kitchen, procuring food, processing food and at the end of the night cleaning and properly storing food.

Ms. Mathews stated that his restaurant has been a great addition to the community and she has been a satisfied customer, but regulations of food establishments promulgated by the state need to be



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followed. She acknowledged that restaurants may be short-staffed at this point, but the reported chaos must be addressed, and that a plan must be put in place to comply with all regulations.

Mr. Mendez responded that sometimes chaos is beyond his control. As a result of a large number of school-aged children dropped off at his restaurant, a complaint was received in early December that children had access to the bar. As a result, he installed a gate to prevent access. Dr. Epstein noted that it is a food safety concern that patrons or others have access to any food preparation areas including behind the bar area. Dr. Epstein noted that these types of access complaints date back to 2019. Mr. Mendez stated that at that time the complaint had to do with his nine-year old daughter on the premises in that area.

Mr. Mendez stated that unannounced inspections at the busiest times of service, i.e. 7:30PM on a Friday night or Sunday at 3:00PM, are likely to find violations because these are high pressure times for staff, but these are not ongoing everyday issues. He serves two-hundred and fifty meals per day and no one has become sick from his restaurant in twenty-two years of service. Dr. Epstein noted that while Mr. Mendez acknowledged that it is inevitable that inspectors will find some violations at peak times of operation, violations at any time are unacceptable. The role of the Health Department is to ensure that food is safe at all times, not just some of the time.

Ms. Acosta stated that it is within the authority of health agents to inspect a restaurant at any time unannounced. Reports with pictures were given to Mr. Mendez subsequent to inspections and resources, such as Spanish-speaking food safety trainers, were offered. Support has been offered at the conclusion of every inspection. Mr. Mendez responded that inspectors were not helpful to him, that inspectors came in, “walked around and walked away.”

Dr. Partridge noted that issues have come up more than once over the last two years, and violations are determined not by the Town of Needham but by the state. It is incumbent on the Town to ensure that the public health is protected and regulations are enforced.

Mr. Mendez stated that the report was unfair to him and his staff. He said that everything has been addressed on the order and he has submitted temperature logs. Ms. Acosta noted that she has not received any temperature logs from the restaurant. Ms. Mathews noted that in her review of the report, there were temperature and storage violations. Additionally, other violations included no soap at the hand sinks and a dog was present in the kitchen. These are violations of basic standards. She repeated the role of the Health Department is to safeguard community health. She also commented that these types of violations are rare in the Town’s restaurant industry, and in her three years on the Board, this is the first restaurant hearing she has attended. Ms. Mathews also added that the Health Department staff has expended an inordinate amount of time in providing oversight to this one restaurant.

Leona Mendez appeared before the Board. She acknowledged that the restaurant had been short-staffed, but she had promised Ms. Gurge that she would help out in the restaurant and to address and resolve the issues. She also expressed sadness that her children were affected by the closure of the restaurant and were receiving taunts by schoolmates.



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Mr. McDonald stated that both Mr. and Ms. Mendez are hard-working people, and that there is no grudge against Hungry Coyote and his staff wants to work with them to get them into compliance. While there are disputed facts in the inspection reports, Mr. McDonald stands by the inspection by his trained professional staff. He added that a new inspection software program generated digital reports which provide more detail on the exact violations and ways to correct them.

Mr. McDonald added that at this time Hungry Coyote does not have a permit to operate in Needham. His staff has identified problems and ways to correct them and the restaurant has not taken steps to do so. Because the restaurant remains open without a permit, this is a serious violation. The Town cannot allow food establishments to operate without permits. If this continues, further legal steps will have to be taken.

Mr. Mendez stated that he took it personally, because he was being told how to run his business and that he was putting people in danger. He claimed that he will replace the gasket on the door and submit to Ms. Acosta all temperature and cleaning logs by Monday, January 10th.

Ms. Mathews stated that it is painful to hear that the children are experiencing challenges from their classmates. She stated that it was not the intention of the Board to cause harm to the family. Ms. Mathews reiterated that the environmental health staff is ready to work with them to keep the restaurant open and ensure that the restaurant succeeds. She commented that she had heard Mr. Mendez' "suitcase story" at the Temple Beth Shalom a few years ago and connected with that. She wanted to see his establishment do well and wished him well in that endeavor.

Mrs. Mendez indicated to Ms. Acosta that she is willing to work with her to have the restaurant remain open.

Mr. Mendez expressed that he did not know why the Board of Health shut the restaurant down. He has been a resident of Needham for thirteen years and would not think of harming anyone in Needham. Ms. Acosta said that there were eleven violations in the suspension order. Ms. Gurge stated that after multiple emails and weekly inspections, not enough improvements were seen week to week. A long-term safety consultant was suggested to put an improvement plan in place. In other restaurants, this consultant had achieved significant improvements. New staff who came on board could be trained quickly and efficiently. Mr. Mendez refused the help of a consultant to work with him and his staff.

Mr. Mendez stated that on Monday he would provide temperature and cleaning logs, certification of CPR training for all employees as well as allergy training and CPR training for additional staff.

Attorney Heap noted that the purpose of the hearing was to allow the restaurant to explain and show cause why the suspension order should be modified or withdrawn. At the conclusion of the testimony tonight, the Board has three options: to sustain the order as it exists; to modify it in some way; or to lift it. At the conclusion of the hearing, the Board would discuss the options and next steps. Dr. Partridge thanked Mr. and Mrs. Mendez for their testimony before the Board.



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Upon motion duly made by Dr. Epstein and seconded by Dr. Cosgrove, it was unanimously voted to close the hearing. Dr. Partridge-Y, Dr. Brown-Y, Dr. Cosgrove-Y, Dr. Epstein-Y and Ms. Mathews-Y. Motion carries 5-0, unanimous.

Mr. McDonald stated that Ms. Acosta and Ms. Gurge had been meticulous and detail-oriented in laying out a path for Hungry Coyote to come into compliance with the food code. Mr. Mendez needs to take the steps recommended by his staff to regain his permit.

Ms. Mathews asked Ms. Acosta to review the requirements of the Memorandum of Understanding delivered on December 3, 2021:

- One employee's CPR certification expired June, 2021. It was unclear whether the exam was retaken or not.
- At least two ServSafe Food Protection Manager Certificates must be submitted.
- There must be at least one ServSafe Food Protection Manager on-site at all hours the establishment is operational and able to answer food safety questions as well.
- The establishment must be deep-cleaned and cleaning logs must be implemented and submitted weekly. The fly issue was taken care of.
- Temperature logs must be implemented and submitted weekly.
- Pest control services must be contracted and conducted every other week. Copies of these pest control reports must be submitted for review.
- Must take sanitizer concentration/pH testing paper logs to ensure proper sanitizer concentration is set up at three-bay sink. Logs will need to be submitted weekly.
- Also asked for logs for deep cleaning, temperature, and pest control t each week.
- Choke saver training must be conducted and a valid training certificate must be submitted.
- Food allergy training must be completed and additional training certificates must be submitted for additional staff.
- Arrange for all cold-holding equipment on site to be assessed by a qualified outside food safety consultant and install new and/or additional cold-holding equipment as found to be necessary by outside consultant for proper cold-holding storage.
- Ensure all food is stored properly, protected, and in the correct order.
- A new plan review of the establishment must be submitted Any new equipment spec sheets will need to be submitted for approval, or if insufficient cold-holding equipment observed or if additional equipment cannot be accommodated on site.

Ms. Acosta responded to a question from Dr. Partridge that the restaurant would need to be closed for deep cleaning for a day or two. Ms. Gurge noted that Mrs. Mendez had expressed appreciation for Pedro Diaz who did the previous food training for staff. Mr. Diaz also assisted with inspections at another restaurant. Ms. Gurge will contact Lisa Berger of Berger Food Safety to assist. Mr. McDonald acknowledged the challenges that restaurants have faced in the pandemic. He suggested the possibility of the Town providing these services at no cost to the client. Dr. Brown agreed that would be a way to support the restaurant.



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Ms. Acosta noted that additional refrigeration is needed. With more customers in the restaurant as COVID subsides, the bar will be open and require more refrigeration for kegs, etc.

Dr. Epstein stated that while the Board has no option but to enforce the state code, he suggested that the Board take a dual path to sustain the order while working on a parallel track to get the restaurant back up and running. First and foremost would be a commitment from the owner to meet the minimum basic requirements of food safety. The owner would need to accept the terms of the dual offer.

Mr. McDonald noted that while the Board needs to assess fines for operating without a permit, the Board would in the overall assessment consider the good faith efforts of the owner and the possible forgiveness of the debt. This decision would be at the conclusion of transactions with the restaurant.

Mr. Heap noted that to the extent the Board has determined to sustain the order, the timing of the next steps are important in the enforcement of the order. Dr. Partridge stated that the restaurant would be allowed to come into compliance with basic minimum standards of operation to remain open, and if not met, the Board would pursue legal steps of a court injunction to close the restaurant.

Mr. Heap stated that steps to sustain the order include a) fines being assessed daily while the restaurant was closed and taking steps to come into compliance; and b) reserve the right for the Board to pursue a court injunction if the restaurant does not come into compliance within a specified time.

Dr. Brown asked Ms. Acosta if she would be able to get someone on board to do the outstanding training. Ms. Acosta stated that the training is available online for a minimal cost of \$10.00.

Upon motion duly made by Dr. Epstein and seconded by Dr. Cosgrove, it was unanimously voted to sustain the suspension order, and should Hungry Coyote defy the order, fines will be imposed on a daily basis, but time will be allowed to meet the minimum requirements of the permit, and failure to comply with the minimum requirements by Wednesday, January 12th will result in the Town's pursuing a court injunction to shut down the restaurant. Dr. Partridge-Y, Dr. Brown-Y, Dr. Cosgrove-Y, Dr. Epstein-Y and Ms. Mathews-Y. Motion carries 5-0, unanimous.

Mr. McDonald thanked his staff, Ms. Acosta, Ms. Gurge and Ms. Pancare for their professionalism throughout the process. The Board thanked them as well in this instance, as well as their efforts in keeping all restaurants in Town in compliance with health regulations.

Ms. Mathews noted that going forward a re-establishment of trust and collaboration is needed. The involvement of a third-party consultant in the process will assist in the re-establishment of that relationship. Ms. Acosta also noted that a new part-time health agent had been hired.

Next Meetings

January 20, 2022 @ 9:00AM

February 10, 2022 @ 5:00PM



NEEDHAM PUBLIC HEALTH DIVISION



Adjournment

Upon motion duly made by Dr. Epstein and seconded by Dr. Cosgrove, it was unanimously voted to adjourn. Dr. Brown-Y, Dr. Cosgrove-Y, Dr. Epstein-Y, Dr. Partridge-Y and Ms. Mathews-Y. Motion passed 5-0. The meeting was adjourned at 7:17PM.

Attachment:

January 5, 2022 Meeting Packet

DRAFT



NEEDHAM PUBLIC HEALTH DIVISION



Unit: Emergency Management

Date: December 2021

Staff member: Michael Lethin

Activities and Accomplishments

Activity	Notes
Planning	Begun the process of Continuity of Operations Planning (COOP) across Town departments. There is currently no Town COOP.
Resource Requests	Continuing to work with MEMA on resource requests for the Town, most recently the Police and Fire Departments were supported with PPE and cleaning supplies.
Training	MEMA has reached out with interest in using the Needham Public Safety Building to host trainings for Needham and other towns once the project is complete.



Needham Public Health Division

December 2021

Assist. Health Director - Tara Gurge

Health Agents - Diana Acosta, Monica Pancare and Sheri Miller-Bedau



Unit: Environmental Health

Date: 1/20/2022

Staff members: Tara Gurge, Diana Acosta, Monica Pancare and Sheri Miller-Bedau

Intern: Ally Littlefield

Activities and Accomplishments

Activity	Notes
Part-time Env. Health Agent hired	A new part-time health agent, Sheri Miller-Bedau, started with us on Monday, Dec. 6 th . She will conduct food inspections during her off hours from her other job and will work 5 hrs./week for us throughout the month of December and will bump up to 10 hrs./week starting in February.
Hungry Coyote	Memorandum of Understanding (MOU) was issued on December 3, 2021. Manager of establishment submitted a signed agreement on December 7, 2021. Follow up inspections were conducted on December 9, 2021 and December 27, 2021. At the 12/9 inspection, the legitimacy of a ServSafe certificate was called into question when one of the staff members who had a certificate reported not taking an exam. The establishment hired Berger Food Safety to conduct a Food Safety 101 training on 12/20/2021 where 5 staff members attended, including the manager. Terms of the MOU were not being met such as maintaining and submitting temperature, cooling, and sanitizer logs. On the final reinspection, priority violations were still found. Complaints of possible foodborne illness and excess trash in the dumpsters were reported and followed up on. A 2022 Food Establishment permit was not issued to the establishment. A Summary Suspension Order was issued on 12/30/21 and the restaurant was directed to cease and desist operations as of January 1, 2022.
#1688 Central Ave. Daycare Site Soil Testing	Tara gathered emails from concerned residents to be included in a combined packet, which was distributed to the Board of Health prior to the December open comment meeting.
Online Permit application updates	Our online Septic Construction permit application is almost ready to be uploaded to our online permitting system. Still waiting to hear back from Town Counsel on receiving guidance on how the septic Certificate of Compliance document will be handled, specifically in reference to having this document wet-stamped by the MA Registered Professional Engineer, as is typically required for our process that is conducted now. Once this hard copy Certificate of Compliance is signed and wet-stamped by the engineer and signed by the septic installer, we then sign and date this document, which is then forwarded to the owner which then allows the septic system to be open for use.

Other Public Health Division activities this month: (See report below.)

Activities

Activity	Notes
Annual Permit Renewals	86 - 2022 Renewal Permits issued in December 2021: - 5 – Bodywork Practitioner - 5 – Bodywork Establishment - 56 – Food Establishments - 2 – Hotel - 5 – Indoor Swimming Pools - 10 – Septage/Grease/Medical Waste Haulers - 4 - Septic System Installers - 4 - Sharps Disposal - 4 – Tobacco Establishments Total Permits Issued for 2022: 181
COVID 19 Complaint	1– Complaint Received: - <u>Needham House of Pizza</u> - An anonymous caller reported that multiple employees were working while being COVID positive. Diana followed up with the owner who reported some staff had tested positive but were excluded from the workplace. All staff were required to wear a mask while working. Those who tested positive were asked not to come back to work until their quarantine period was over and they had no symptoms or they tested negative.
Demo Reviews/ Approvals	3 - Demolition signoffs: - 99 Evelyn Rd - 73 St Mary St - 53 Wayne Rd
Food	1 – Plan Review Items/inquiries received from: - <u>Smoothie Bar a 915 Great Plain Ave.</u> – Application Submitted. Pending Special Permit. Next step is walk through. Still pending.
Food Complaints/Follow-ups	1/1 – Food Complaints/Follow-ups – - <u>Hungry Coyote (1/1)</u> - A customer called to report they were “violently ill including a fever” a day after eating at Hungry Coyote. They also were concerned with the general sanitation of the establishment. Diana followed up with the complainant who reported not going to their doctor to confirm whether they had a foodborne illness. Owner was made aware of complaint on subsequent re-inspection of the establishment.
Housing Complaints/Follow-ups	4/4 – Housing Complaints/Follow-ups conducted at: – <u>North Hill (1/1)</u> – Needham Fire reported a resident of North Hill had a bed bug infestation in their unit. Diana followed up with her contacts at North Hill to report the findings and was connected to the Executive Director and Housekeeping Manager. Pestex was deployed on site. The examined the affected room and the rooms plus above, below, right, and left. Detailed cleaning of all areas was conducted. No live or dead bed bugs were found in the unit. Awaiting bed bug protocols to be submitted from North Hill. – <u>Webster Green (1/1)</u> – Concerns reported of pest activity and also reported that cars are parking in designated Fire Lanes. Tara referred Fire Lane concern to Fire Dept. Spoke to Corp. Office about other reported concerns. Copies of pest control reports requested. – <u>Enslin Rd. (1/1)</u> - Follow-up from previous hoarding concern. UPDATE - Owners’ representative contacted Tara to let her know that home has been professionally deep cleaned and ready for a re-inspection. Tara and Ally conducted a reinspection of the home. Home was deep cleaned and all trash items removed, etc., but the home had

	other MA Housing Code violations that needed to be addressed prior to allowing occupancy. Revised order letter sent. - <u>Charles River Landing (1/1)</u> - Concern received from a resident that handicap button to front entrance door was not working. Tara called on-site property manager about issue and she placed a call to have it repaired.
Nuisance – Complaints/ Follow-ups	2/2 – Nuisance Complaints/Follow-ups: - <u>Hungry Coyote (1/1)</u> – Two dumpsters owned by Barry Brothers hauling company behind the establishment were reported to be overflowing. Owner sent Diana photos which showed the recycling dumpster was beyond its limit. Owner called for additional service. - <u>100 Highland Ave (1/1)</u> – A landlord reported rats in the area of the dumpsters near Frank Webb Home. Diana contacted the building owner. The building owner reported the entire property is serviced by a professional pest service on a bimonthly basis though they would follow up with the company to place emphasis on this area. A pest control report was later submitted where the company did focus on the area. They did not see any burrows to indicate rat activity. NW Pest Control performed the services.
Planning Board site plan review	1 - Planning Board reviews/correspondence received from residents RE: - <u>#1688 Central Ave.</u> – Tara continued to receive and combine correspondence from concerned residents about the proposed Daycare site, specifically in reference to the proposed soil testing. Correspondence was collected right up until the Dec. Board of Health meeting and was shared with the Board, prior to the open comment session. Planning Board is looking for the Board of Health’s guidance re: the hiring of the third-party Licensed Site Professional, as stated in the recommendation to the Planning Board, which was given after the Dec. BOH meeting. (To be discussed.)
Septic Inspections	4 – Inspections conducted for: - <u>1607 Central Ave.</u> – Perc Test. - <u>39 Brookside Rd. (x3)</u> - Bottom check, SAS field check and D-Box check for Eljen alternative system. (Ongoing.)
Septic – Plan Review/Approvals/ Permits issued	2 - Septic-related Plan Review/Approvals issued to: - <u>#40 Windsor Rd.</u> - Reviewed final as-built plan. Issued Certificate of Compliance. - <u>#39 Brookside Rd.</u> - Issued septic construction permit. And one Trench permit issued.
Septic Installer Exam	1 – Septic installer exam issued to: - Bill Rodenhiser, Rodenhiser Excavating
Well Follow-ups/ Approval to Drill letter issued	2 – Well Permit plan review follow-ups conducted for: - <u>#130 South St.</u> - Geothermal Well Approval to Drill letter issued. Request submitted to Water and Sewer to conduct the pre-operation inspection, which will need to be conducted prior to the issuance of the permit to allow the wells to open for use. UPDATE - Nigel from Water and Sewer Dept. was due to head out to site on Dec. 6th. (Will touch base to see if there are any additional updates.) - <u>#1516 Central Ave.</u> - New homeowner had a question about a possible water well in his barn. Referred to Water and Sewer and they went out to investigate and no well was observed on site.
Zoning Board of Appeals plan review	1 – Zoning Board of Appeals plan review conducted for: - <u>#32 Mark Lee Rd.</u> - Comments sent.

FY 21 Priority FBI Risk Violations Chart (By Date)

Restaurant	Insp. Date	Priority Violation	Description
Hungry Coyote	12/9/2021	3-302.11 (A)(1) Raw Animal Foods Separated from RTE - Code: Food shall be protected from cross-contamination by: (1) Separating raw animal foods during storage preparation, holding and display from: (a) Raw RTE food including other raw animal food such as fish for sushi or molluscan shellfish or other raw RTE food such as fruits and vegetables, and (b) cooked RTE food. COS 3-302.11 (A)(1) Raw Animal Foods Separated from RTE Code: Food shall be protected from cross-contamination by: (1) Separating raw animal foods during storage preparation, holding and display from: (a) Raw RTE food including other raw animal food such as fish for sushi or molluscan shellfish or other raw RTE food such as fruits and vegetables, and (b) cooked RTE food.	Kitchen - Raw meat stored in same container as cooked products. Kitchen -Raw beef containers stored next to boxes of cilantro and chiles. Also stored above beer cans. Beef was moved to a low shelf on the other side of the walk in.
The Rice Barn	12/18/2021	3-304.11 Food Contact with Soiled Items - Code: Food shall only contact surfaces of: equipment and utensils that are cleaned and sanitized; single-service and single-use articles; or linens, such as cloth napkins that are used to line a container for the service of foods AND are replaced each time the container is refilled for a new consumer. 3-501.16 (A)(2) (B) Proper Cold Holding Temps. - Code: Except during preparation, cooking, or cooling, or when time is used as the public health control as specified under section 3-501.19, and except as specified under paragraph (B) and in paragraph (C) of this section, TCS food shall be maintained at 41°F or less. Eggs that have not been treated to destroy all viable Salmonellae shall be stored in refrigerated equipment that maintains an ambient air temperature of 45°F or less	Basement - Knives stored in basement soiled. Store after cleaning and sanitizing properly Kitchen - Chicken Satay stored on dish counter at room temp 71f. Product discarded
North Hill – Central Kitchen	12/18/2021	3-501.16 (A)(2) (B) Proper Cold Holding Temps. - Code: Except during preparation, cooking, or cooling, or when time is used as the public health control as specified under section 3-501.19, and except as specified under paragraph (B) and in paragraph (C) of this section, TCS food shall be maintained at 41°F or less. Eggs that have not been treated to destroy all viable Salmonellae shall be stored in refrigerated equipment that maintains an ambient air temperature of 45°F or less.	Cafe Bakery service line - Milk, cream and other dairy products in excess of 49 F Cease and desist using this unit for any foodstuffs. True single door refrigerator is not compliant Repair within 5 business days and provide a service report. If you replace with a new unit

			provide service invoice.
Hungry Coyote	12/27/2021	3-302.11 (A)(1) Raw Animal Foods Separated from RTE - Code: Food shall be protected from cross contamination by: (1) Separating raw animal foods during storage preparation, holding and display from: (a) Raw RTE food including other raw animal food such as fish for sushi or molluscan shellfish or other raw RTE food such as fruits and vegetables, and (b) cooked RTE food. 3-302.11 (A)(1) Raw Animal Foods Separated from RTE - Code: Food shall be protected from cross-contamination by: (1) Separating raw animal foods during storage preparation, holding and display from: (a) Raw RTE food including other raw animal food such as fish for sushi or molluscan shellfish or other raw RTE food such as fruits and vegetables, and (b) cooked RTE food.	Kitchen - See 23 3-501.17 for photo. Raw Churros stored next to an open package of meat. Kitchen - Avocados stored under raw meat. To the right of the raw carnitas was a large container of pico de Gallo that is ready to eat.
Residence Inn by Marriott Kitchen	12/31/2021	7-201.11 Storage Separation - Code: Poisonous or toxic materials shall be stored so they cannot contaminate food, equipment, utensils, linens, and single-service and single use articles by: (A) Separating the poisonous or toxic materials by spacing or partitioning; and (B) Locating the poisonous or toxic materials in an area that is not above food, equipment, utensils, linens, and single-service or single-use articles.	Buffett Area - Toxic chemicals not segregated from food products and supplies. Store all toxic chemicals away and separated as required

Category	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June	FY'22	FY'21	FY '20	FY' 19	FY' 18
Biotech registrations	0	0	0	1	0	0	0	0	0	0	0	0	1	0	1	1	1
Bodywork Estab. Insp.	0	0	0	0	0	5	0	0	0	0	0	0	5	6	7	14	11
Bodywork Estab. Permits	0	0	0	0	0	5	0	0	0	0	0	0	5	13	9	9	6
Bodywork Pract. Permits	0	0	0	0	0	5	0	0	0	0	0	0	5	12	23	21	22
COVID 19 Complaints	0	1	1	0	0	1	0	0	0	0	0	0	3	123	0	0	0
COVID 19 Follow Ups	0	1	1	0	0	1	0	0	0	0	0	0	3	122	0	0	0
Demo reviews	8	8	11	9	0	3	0	0	0	0	0	0	39	76	73	104	105
Domestic Animal permits	3	1	0	1	0	0	0	0	0	0	0	0	5	29	1	21	19
Domestic Animal Inspections	0	3	3	2	0	0	0	0	0	0	0	0	8	8	3	22	3
Food Service Routine insp.	16	24	14	10	16	17	0	0	0	0	0	0	97	134	149	200	225
Food Service Pre-oper. Insp.	5	0	5	4	0	0	0	0	0	0	0	0	14	16	48	12	32
Retail Food Routine insp. Or 6 month check in	0	0	1	2	2	2	0	0	0	0	0	0	7	12	33	46	60
Residential Kitchen Routine insp.	0	2	1	0	0	0	0	0	0	0	0	0	3	5	3	6	8
Mobile Routine insp.	0	0	1	0	0	0	0	0	0	0	0	0	1	10	4	17	13
Food Service Re-insp.	0	0	0	2	2	5	0	0	0	0	0	0	9	7	21	28	53
Food Establishment Annual/Seasonal Permits	4	1	0	1	62	56	0	0	0	0	0	0	124	134	155	140	171
Temp. food permits	1	2	10	5	0	0	0	0	0	0	0	0	18	9	67	134	163
Temp. food inspections	1	1	3	1	0	0	0	0	0	0	0	0	6	3	10	37	29
Farmers Market permits	3	1	0	0	0	0	0	0	0	0	0	0	4	15	14	14	14
Farmers Market insp.	31	24	33	45	0	0	0	0	0	0	0	0	133	124	158	229	127
Food Complaints	2	0	1	2	2	1	0	0	0	0	0	0	8	7	49	18	20
Follow-ups food complaints	2	0	1	2	2	1	0	0	0	0	0	0	8	8	48	21	21
Food Service Plan Reviews	2	2	1	1	0	0	0	0	0	0	0	0	6	12	14	20	42
Food Service Admin. Hearings	0	0	0	0	1	0	0	0	0	0	0	0	1	1	3	0	0
Grease/ Septage Hauler Permits	0	0	1	0	7	9	0	0	0	0	0	0	17	13	20	21	24
Housing (Chap II Housing) Annual routine inspection	0	0	0	7	0	0	0	0	0	0	0	0	7	7	7	0	14
Housing Follow-up insp.	1	0	0	0	0	0	0	0	0	0	0	0	1	2	0	0	5
Housing New Complaint	3	1	6	5	1	4	0	0	0	0	0	0	20	40	41	22	22
Housing Follow-ups	9	3	6	8	3	4	0	0	0	0	0	0	33	63	56	28	24
Hotel Annual inspection	0	0	0	0	0	3	0	0	0	0	0	0	3	3	3	3	3
Hotel Follow-ups	0	0	0	0	0	0	0	0	0	0	0	0	0	1	15	0	0
Nuisance Complaints	8	6	5	3	0	2	0	0	0	0	0	0	24	45	34	55	42
Nuisance Follow-ups	7	8	6	3	2	2	0	0	0	0	0	0	28	60	55	69	42
Pool inspections	0	1	0	0	0	6	0	0	0	0	0	0	7	15	13	20	12
Pool Follow up inspections	0	1	0	0	0	0	0	0	0	0	0	0	1	5	3	12	7
Pool permits	0	1	0	0	0	5	0	0	0	0	0	0	6	17	11	19	12
Pool plan reviews	0	0	0	0	0	0	0	0	0	0	0	0	0	5	0	3	44
Pool variances	0	1	0	0	0	4	0	0	0	0	0	0	5	5	6	5	7
Septic Abandonment	1	1	1	2	0	0	0	0	0	0	0	0	5	17	21	9	5

Category	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June	FY'22	FY'21	FY '20	FY' 19	FY' 18
Addition to a home on a septic plan rev/approval	0	3	2	1	3	0	0	0	0	0	0	0	9	5	5	2	2
Septic Install. Insp.	0	2	2	4	0	4	0	0	0	0	0	0	12	11	13	21	28
Septic COC for repairs	0	1	0	0	0	0	0	0	0	0	0	0	1	2	5	3	1
Septic COC for complete septic system	0	0	0	1	1	1	0	0	0	0	0	0	3	1	3	4	3
Septic Info. requests	5	4	3	6	5	6	0	0	0	0	0	0	29	86	61	62	51
Septic Soil/Perc Test.	1	0	0	0	0	1	0	0	0	0	0	0	2	8	1	1	2
Septic Const. permits	0	0	2	0	0	1	0	0	0	0	0	0	3	6	6	6	5
Septic Installer permits	0	0	1	0	0	4	0	0	0	0	0	0	5	8	6	8	9
Septic Installer Tests	0	0	1	0	0	1	0	0	0	0	0	0	2	3	2	5	3
Septic Deed Restrict.	0	0	0	0	0	0	0	0	0	0	0	0	0	4	1	1	3
Septic Plan reviews	1	3	3	4	2	1	0	0	0	0	0	0	14	14	8	9	23
Septic Trench permits	0	1	1	2	0	1	0	0	0	0	0	0	5				
Disposal of Sharps permits	0	0	0	0	2	4	0	0	0	0	0	0	6	8	7	7	9
Disposal of Sharps Inspections	0	0	0	1	2	4	0	0	0	0	0	0	7	8	7	7	7
Planning Board Subdivision Sp Permit Plan reviews/Insp. of lots	0	1	1	1	1	0	0	0	0	0	0	0	4	20	4	1	1
Subdivision Bond Releases	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0
Special Permit/Zoning	2	1	0	1	3	1	0	0	0	0	0	0	8	18	17	34	15
Tobacco permits	0	0	0	0	2	4	0	0	0	0	0	0	6	7	10	10	11
Tobacco Routine insp	0	0	0	0	6	0	0	0	0	0	0	0	6	7	8	14	18
Tobacco Follow-up insp.	0	0	0	0	0	0	0	0	0	0	0	0	0	1	8	3	3
Tobacco Compliance checks	0	0	0	6	0	0	0	0	0	0	0	0	6	6	30	30	41
Tobacco complaints	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	3	4
Tobacco Compl. follow-ups	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	3	4
Trash Hauler permits	0	0	0	0	1	0	0	0	0	0	0	0	1	16	15	17	14
Medical Waste Hauler permits	0	0	0	0	2	0	0	0	0	0	0	0	2	2	2	2	1
Well - Plan Reviews, Permission to drill letters, Insp.	3	0	0	0	1	2	0	0	0	0	0	0	6	11	2	6	2
Well Permits	3	0	0	0	0	0	0	0	0	0	0	0	3	1	1	1	0



NEEDHAM PUBLIC HEALTH DIVISION



Unit: Traveling Meals Program

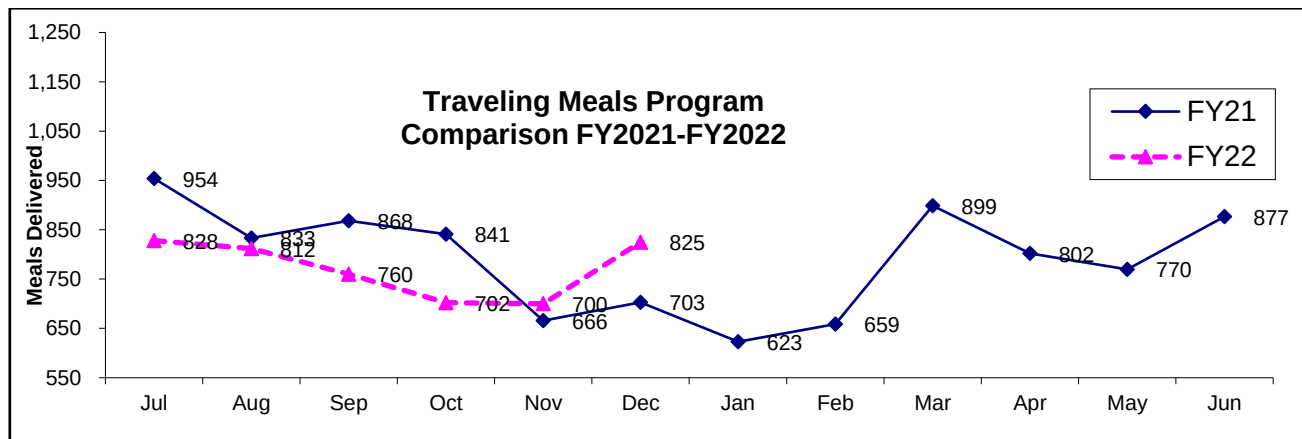
Monthly Report for November, 2021

Staff member: **Maryanne Dinell, Program Coordinator**

Activities

Activity	Notes
COVID 19 –precautions continue by summer staff as they deliver meals to homebound Needham residents in need of food.	Summer Traveling Meals Program ends Meal delivery for month completed by 28 volunteers
825 Meals delivered in December, 2021. 42 Consumers currently 35 Springwell 7 Private Pay 2 enrollments for December	No issues or incidents 2 first time on Program-Springwell Clients

Summary overview for the month: **Graph of Meal Deliveries for the month December, 2021**





NEEDHAM PUBLIC HEALTH DIVISION



Unit: Accreditation report

Date: November and December 2021

Staff: Lynn Schoeff

Activities and Accomplishments

Activity	Notes
Marijuana regulation	Nov and Dec. Research for marijuana regulation
Public Health Accreditation Board (PHAB) Pathways Program	• This is an alternate recognition program for small local health departments - summary report for Board of Health • Needham was accepted as pilot site • Began work on the Readiness Assessment, which is a preliminary audit of Needham's preparedness to pursue accreditation.
Policies	Nov. • Foodborne illness (EH) – not final • Anaphylaxis protocol (PHN) – not final
PH WINS – Public Health Workforce Interests and Needs Survey	Nov. 100% of Public Health staff participated in national survey. A report about staff development needs will be available in the early part of 2022
PHAB 2022	Nov. Review and feedback about 2022 proposed Standards and measures
Massachusetts Office on Disabilities grant	Received notice on 12/16 for \$60,000 for self-assessment of Needham facilities for compliance with the Americans with Disabilities Act. Setting up for the program: documents signed, began the posting process with a scope of service.



Public Health Accreditation Board Standards & Measures Version 2022

The first edition of the *Public Health Accreditation Board Standards & Measures* was published in 2013. The document is a 261-page book that included 12 “Domains” along with detailed descriptions of programs, activities, and documentation required to achieve accreditation. The twelve domains: ten that align with the 10 Essential Public Health Services; one focused on administrative capacity; and another on public engagement.

The Public Health Accreditation Board (PHAB) has been working on the 2.0 Standards & Measures for at least five years, hosting listening sessions with state, local, and tribal health departments to learn what barriers were keeping so many from applying. This fall, PHAB unveiled a draft of the new requirements and invited feedback through webinars and written comments. The new document will be released in January 2022 and will go into effect in July 2022.

PHAB describes being guided by ongoing changes in the field and by their own strategies regarding innovation, inclusion, diversity, and equity. They also wanted to include lessons learned from Covid. One of PHAB’s goals in revising the standards and measures was clarity, basing the changes on many common questions from local health departments over the years.

PHAB also committed to reducing the burden on health departments by focusing on the intent of the measures rather than on documenting it and reduced the number of required documents by 120.

Some highlights from PHAB Standards & Measures 2022:

- There are now only 10 domains, each corresponding to one of the [Essential Public Health Services](#)ⁱ.
- The new version also identifies which measures align with the [Foundational Public Health Services](#)ⁱⁱ (called Capabilities by PHAB).
- Health equity is emphasized throughout and is included in each domain.
- The new document includes clear guidance and examples about what is accepted *and what is not accepted* as documentation. This guidance was based on years of working with health departments, learning what was confusing, and seeing common misinterpretations of the requirements.

- Preparedness requirements now reflect lessons learned during Covid. They also better align with the [CDC's Operational Readiness Review](#) process for Public Health Emergency Preparedness (PHEP) grantees, and with [NACCHOS' Project Public Health Ready](#).
- The CDC has agreed to exempt accredited departments from the bulk of the operational readiness review process. NACCHO is considering some reciprocity with Project Public Health Ready documentation. (Note: This, rather than being required for certain grants, is where the objective value of accreditation might be.)
- The differences in the emergency preparedness section reflect not only lessons learned from Covid, but also reflect the reality of the FEMA designation of the public health Essential Service Function (ESF 8).

Much of the language in the new document is descriptive and has a more positive approach than the previous Standards & Measures. For example:

Domain 1: Assess and monitor population health status, factors that influence health, and community needs and assets. The new version is more active, focusing on the ongoing activity of assessing and monitoring population health status, including community needs and assets.

Domain 2: Investigate, diagnose, and address health problems and hazards affecting the population. This domain now has a more active voice and includes investigation as a key component. The emergency preparedness section is in this domain and reflects recent changes and challenges in the field, including ensuring that health departments have established processes to access funding and additional personnel during public health emergencies.

Domain 3: Communicate effectively to inform and educate people about health, factors that influence it, and how to improve it. The previous version was only about “informing and educating the public”. It now emphasizes effective communication and the processes necessary to achieve it and has a more positive emphasis on what people can do to improve health outcomes.

Domain 4: Strengthen, support, and mobilize communities and partnerships to improve health. The new language is more reflective of the ongoing work of being engaged with the community.

Domain 5: Create, champion, and implement policies, plans, and laws that impact health. This language, and the accompanying standards and measures,

acknowledges the ongoing work that is required both before and after policies are developed.

Domain 6: Utilize legal and regulatory actions designed to improve and protect the public’s health. The old approach (“enforce public health laws”) had a harder, punitive feel and did not reflect the processes and relationships involved in developing public health regulations.

Domain 7: Contribute to an effective system that enables equitable access to the individual services and care needed to be healthy. This is an example of how equity is more explicitly addressed in the 2022 version.

Domain 8: Build and support a diverse and skilled health workforce. The old domain focused only on “a competent public health workforce,” where the focus going forward is on what is necessary to diversify, develop, and retain people in the workforce. PHAB will require evidence of an inclusive workforce policy.

Domain 9: Improve and innovate public health functions through ongoing evaluation, research, and continues quality improvement. The second standard in this section is “use and contribute to developing research, evidence, practice-based insights, and other forms of information for decision making.” This indicates a move toward flexibility and an understanding the value of what people learn in the process of providing public health services.

Domain 10: Build and maintain a strong organizational infrastructure for public health. This is the exact language of the 2020 Essential Public Health Services and clearly reflects the challenges faced and caused by under-funded and under-recognized public health.

For the full Version 2022, go to <https://phaboard.org/wp-content/uploads/Draft-Initial-SM-V2022.pdf>

ⁱ V 2022 pulls together the work of [several public health frameworks](#) (10 Essential Public Health Services, Foundational PH Services, Public Health 3.0, and Healthy People 2030).

ⁱⁱ See above



NEEDHAM PUBLIC HEALTH DIVISION

Unit: Public Health Nursing

Month: December 2021

Staff member: Hanna Burnett, Mary Fountaine

Activities and Accomplishments

Activity	Notes
COVID-19 Communicable disease investigation	Primary and Secondary disease investigation and contact tracing.
Vaccination Clinics	Influenza Vaccination: As Needed Appts COVID booster clinics
THN	First class held, 6 attendees
Concussion Protocol Monitoring	Continued with support and guidance for youth sports organizations

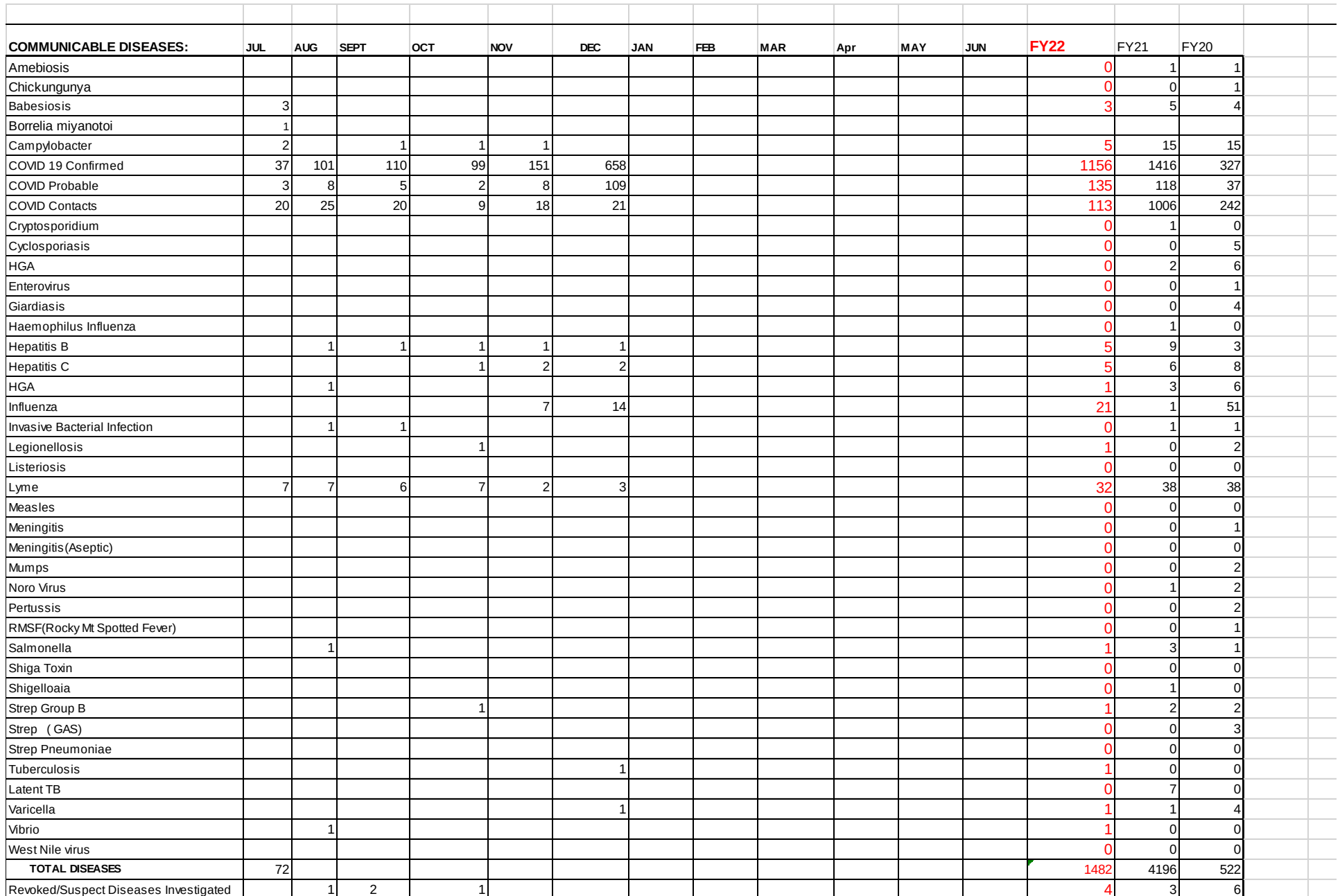
Summary overview for the month:

Total of 13 public clinics held (7 at CATH, 3 at Rosemary, 2 at Pollard, 1 at Olin). Total of 1,905 first, second, or booster doses given for ages 5 and up. Flu vaccine administration continued in the office as needed, total of 15 given. 8 Home visits done for both flu and Covid.

DVAC applied for a (free) student intern from Bentley College for DVAC for the spring semester. DVAC also applied for a small grant from Needham Women's Club for prevention work.

Large amount of Covid-19 follow-up, as cases increased and the CDC released new guidance at the end of the month.

Training activities with new Covid-19 contract tracers as they received MAVEN access, as well as outreach with new nurses on shared services grant.



Needham
Public Health
Prevent. Promote. Protect.



Emergency Management Support Monthly Report December 2021

Prepared by: Taleb Abdelrahim

This monthly report is to provide an update on what I have been doing under supervision of Tiffany Zike.

Summary of work:

- Assisting on applying for a grant from MetroWest health Foundation to address COVID testing
- Assisting nursing department with the ongoing COVID booster clinics



NEEDHAM PUBLIC HEALTH DIVISION



Unit: Substance Use Prevention

Date: December 2021

Staff: Karen Shannon, Karen Mullen, Monica De Winter, Angi MacDonnell, and Jazmine Hurley

Activities and Accomplishments

Activity	Notes
Vaping Grant	- Wellness cards delivered to Tom Denton at the high school. They will be distributed to the middle school and high school students when the SBIRT is done in January. - Met with Denise Demnarski Dec 1 to discuss vaping curriculum. - Ninth grade uses the Everfi vaping module. Denise suggested that she may be able to bump the Everfi Vaping module to eighth grade and plug some of our curriculum recommendations into the ninth-grade curriculum. Ninth grade has 5 lessons on vaping and alcohol. Seventh grade has 3 lessons on vaping. There may be opportunity for incorporating vaping education into the sixth grade Advisory groups. She will review vaping curriculum recommendations and discuss these opportunities with the Wellness teachers.
SPAN Projects/Events	SPAN Quarterly Meeting, December 14, facilitated by Angi. Meeting focus was Action Team breakout discussions for identifying prevention priorities. Impaired Driving PSA - the Community Action Team completed 2 holiday-themed PSAs around the dangers of impaired driving that were posted on SPAN's social media pages during the holiday week. SRO R.J. Poirier and Angi MacDonnell worked together to complete the content. Middle school spring event – SPAN and the Park and Recreation Department continued planning for this event scheduled for May 4, an early release day, from 12 – 3 pm. SPAN Youth Action Team –Liana Carroll, the new leader, hosted the first Youth Action Team meeting of this year. Several new SALSA students, Asst. Principal Pierre Jean, Director of Wellness Denise Domnarski, Asst. Director of Park and Rec Fabien Desrouleaux joined the meeting.
STOP Act grant	SAMHSA grant: STOPing Underage Access and Use of Alcohol: Codifying Youth, Parent and Retailer Education and Compliance in Needham, MA Alcohol compliance checks conducted on December 1 by Needham Police, coordinated by Lt. John McGrath. Diana



NEEDHAM **PUBLIC HEALTH DIVISION**



	Acosta accompanied in one of the two vehicles dispatched for the checks. Diana was instrumental in recruiting underage operatives from Olin College. Out of 31 alcohol licensees, 25 businesses were checked and there were 11 sales violations to minors (underage operatives). • TIPS training is scheduled for January 10, in-person at Powers Hall in Needham Town Hall. Carol Read and Officer Jay Sullivan of Dedham Police Dept. will facilitate training. Both digital and hard copy announcement of the training was sent to the Needham businesses. To date, 32 people registered for the training.
SALSA	During December 44 SALSA youth prevention advocates contributed over 129 hours of service in Needham. Students participated in BID Needham's youth focus group, participated in the SPAN Quarterly meeting and Youth Action Team meeting, The 84 Movement's "Tobacco 101" workshop, SALSA leadership team and action team meetings. Two SALSA leaders were featured in a Needham Channel piece on youth advocacy and skills training.
Medical Marijuana Regulations Research and Review	Working group convened for third meeting on 12/20 to review request by Sira Naturals, owner of registered medical marijuana dispensary in Needham, for amendments to the Needham Board of Health's Medical Marijuana regulations. Lynn Schoeff is researching Cannabis Control Commission regulations for comparison to Needham regulations and will draft a summary and recommendations for the Board of Health at the January 2022 meeting.
Mental Health First Aid for Youth	On December 15 Karen Shannon and Sara Shine conducted virtual MHFA training 12 participants.
Parent Al-anon group	Meetings held every Monday evening. Attendance remains steady averaging 6-8 people each week. Hometown Weekly continues free publishing of meeting announcement in Needham edition.
Training	Wayside Equity Training, 12/2, Karen S., Angi BSAS Prevention Conference, 12/7-8, various staff AdCare: Blunt Talk: Reframing the conversation with youth about marijuana, 12/15, Angi The 84 "Tobacco 101" workshop 12/21, Karen M.
Other Meetings	SPAN Quarterly meeting, 12/14 SPAN Community Action Team, Impaired Driving Campaign, 12/9 SPAN Parent Action Team, 12/16 SPAN Youth Action Team start up with Liana Carroll, 12/16 HHS Racial Equity Committee, 12/16 Stop Act Grant, meeting with SSRE evaluator, 12/21 Middle School Spring event, 12/6, 12/17 Karen S. and Fabien Desrouleaux, Asst. Director of Park and Recreation, 12/29 Myles Tucker of Town Mgr's Ofc and alcohol compliance, 12/30



NEEDHAM PUBLIC HEALTH DIVISION



Summary for Month of December 2021: Focus this month included planning and delivery of the SPAN Quarterly meeting, two impaired driving PSAs, planning of a parent conversation messaging campaign, a middle school wellness event,



**Board of Health
TOWN OF NEEDHAM
AGENDA FACT SHEET**



MEETING DATE: 1/20/2022

Agenda Item	COVID-19 Update
Presenter	Timothy McDonald, Director of Health & Human Services Julie McCarthy, Epidemiologist Mary Fountaine, Public Health Nurse

1.	BRIEF DESCRIPTION OF TOPIC TO BE DISCUSSED
Mr. McDonald, Ms. McCarthy, and Ms. Fountaine will provide the Board of Health will an update about COVID-19 and its impact on the Town of Needham. The Board will review current COVID data, discuss the situation with the recently closed Center for COVID Control testing location, and will review the Emergency Order mandating mask usage in certain municipal settings and the letter from the Charles River Chamber of Commerce that was sent in response.	
2.	VOTE REQUIRED BY BOARD OF HEALTH
No vote is required.	
3.	BACK UP INFORMATION ATTACHED:
1) COVID-19 Data presentation 2) Packet with materials about the Center for COVID Control 3) Board of Health Emergency Order re Mask Mandate in Certain Municipal Settings 4) Charles River Chamber of Commerce Letter re Mask Mandate	

COVID-19 UPDATE

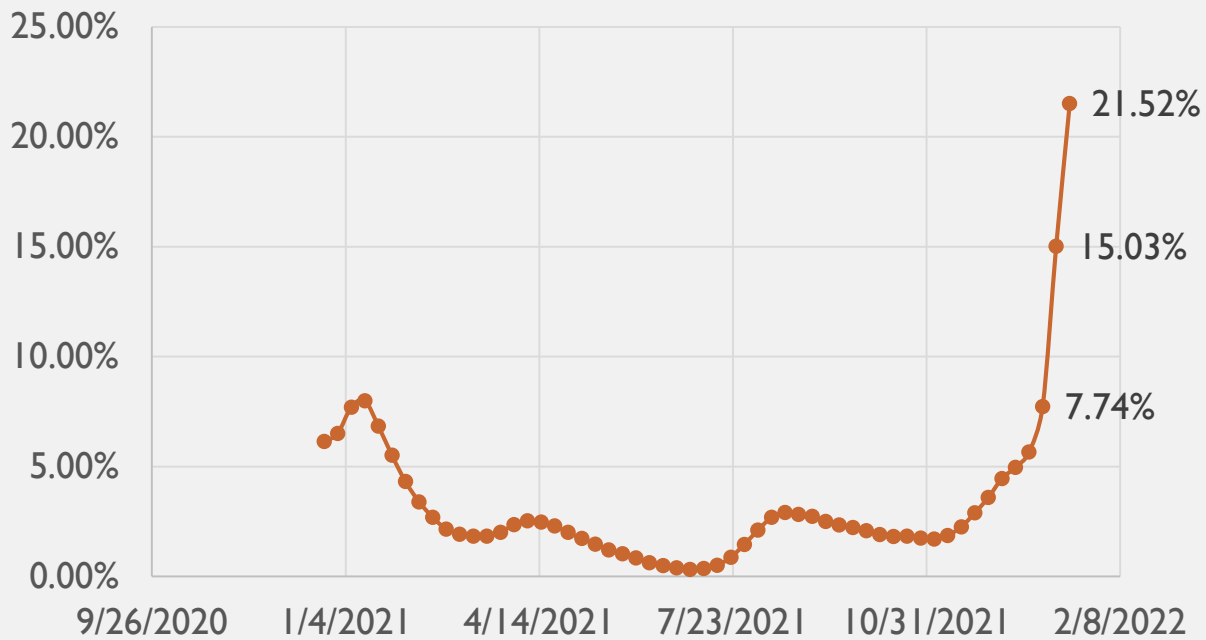
January 20th, 2022
Needham Public Health

INCIDENCE RATE, PERCENT POSITIVITY, VACCINATION RATES

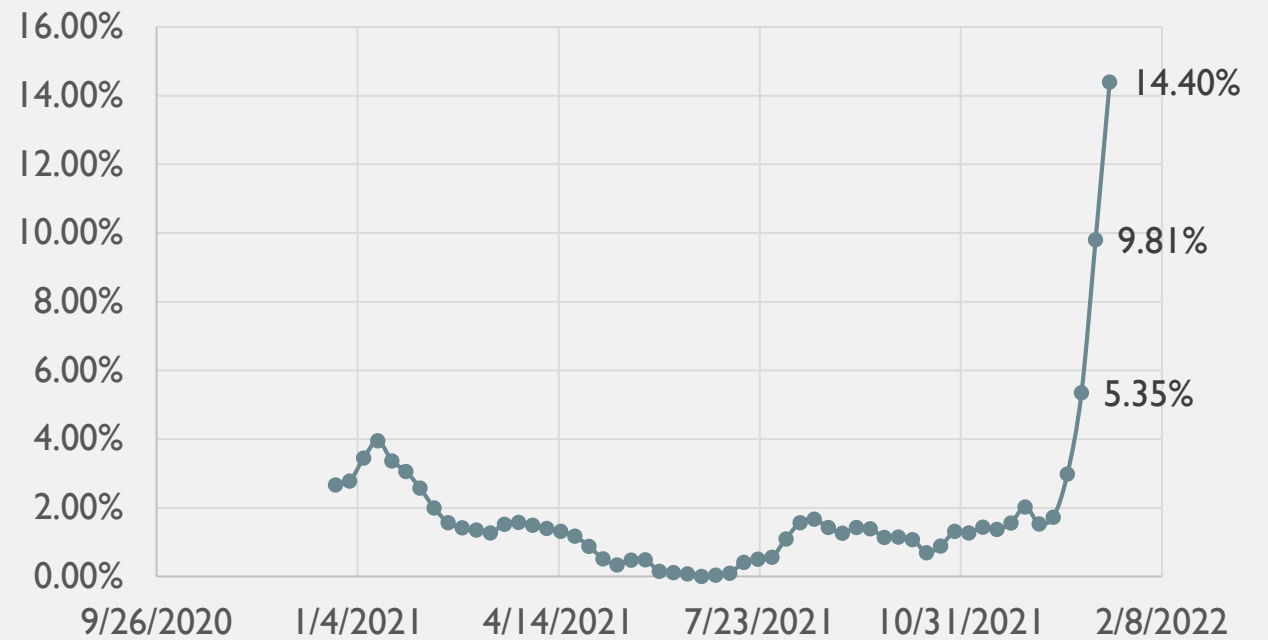
City/Town/ County	Avg. Daily Incidence Rate per 100K (last 14 days)	Percent Positive Tests (last 14 days)	Fully vaccinated individuals per capita	Individuals with booster doses per capita
Massachusetts	267.3 ↗	21.52% ↗	-	-
Needham	204.5↗	14.4% ↗	93%	57%
Middlesex County	249.3 ↗	18.68% ↗	-	-
Framingham	294.2 ↗	20.79% ↗	76%	33%
Newton 	164.0↗	13.18% ↗	87%	51%
Norfolk County	237.2 ↗	20.9% ↗	-	-
Brookline 	144.9 ↗	12.28% ↗	62%	36%
Dedham	224.3↗	19.51% ↗	72%	38%
Dover	187.8 ↗	17.68% ↗	>95%	56%
Norwood	252.1 ↗	22.05% ↗	78%	37%
Walpole	246.2 ↗	23.78% ↗	78%	40%
Wellesley	161.3 ↗	13.75% ↗	76%	44%
Westwood	225.0 ↗	20.44% ↗	91%	51%
Suffolk County	346.9 ↗	23.7% ↗	-	-
Boston 	324.7↗	22.35% ↗	69%	30%

14-DAY PERCENT POSITIVITY

MA Percent Positivity

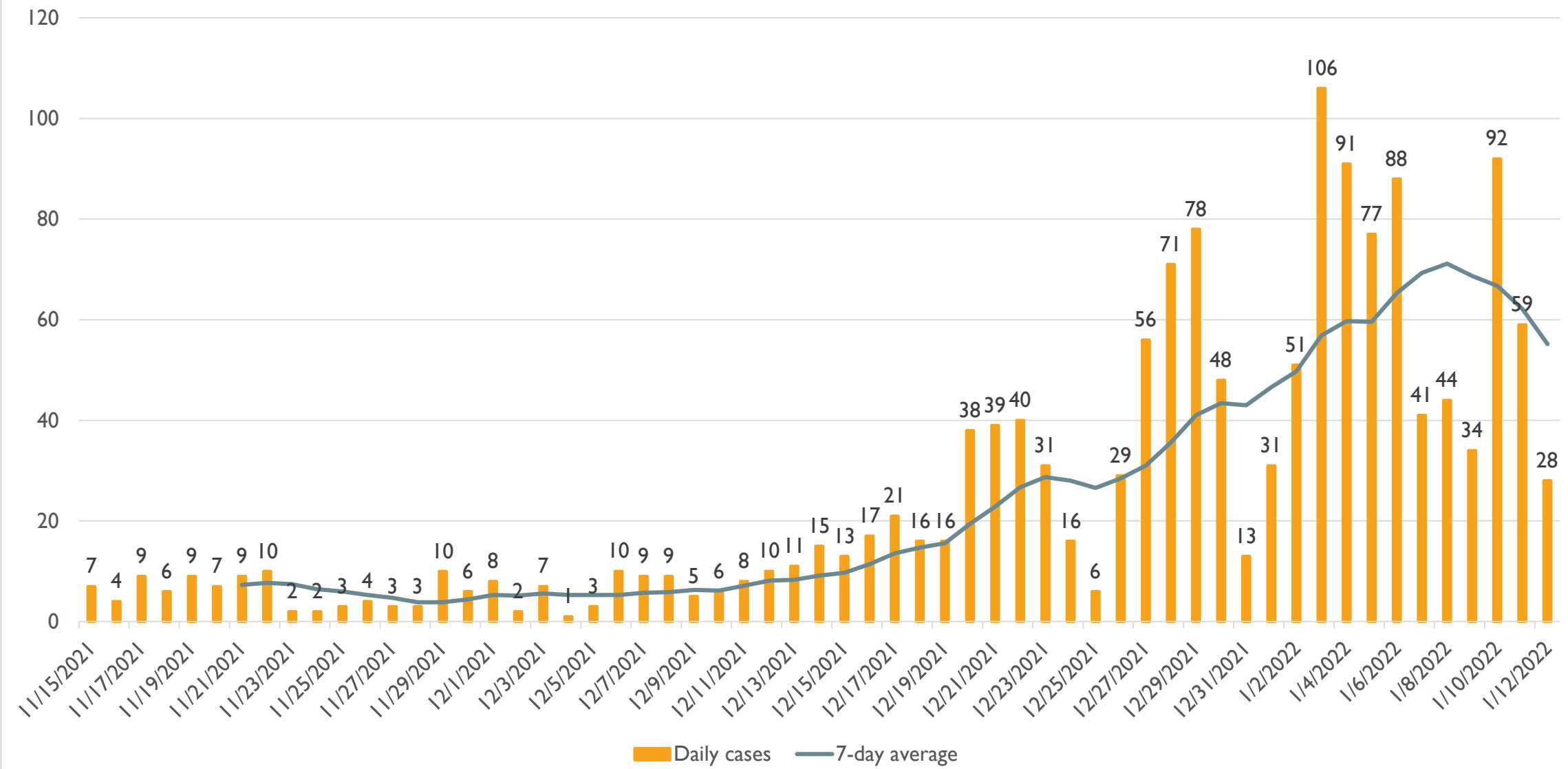


Needham Percent Positivity





Needham Daily Cases

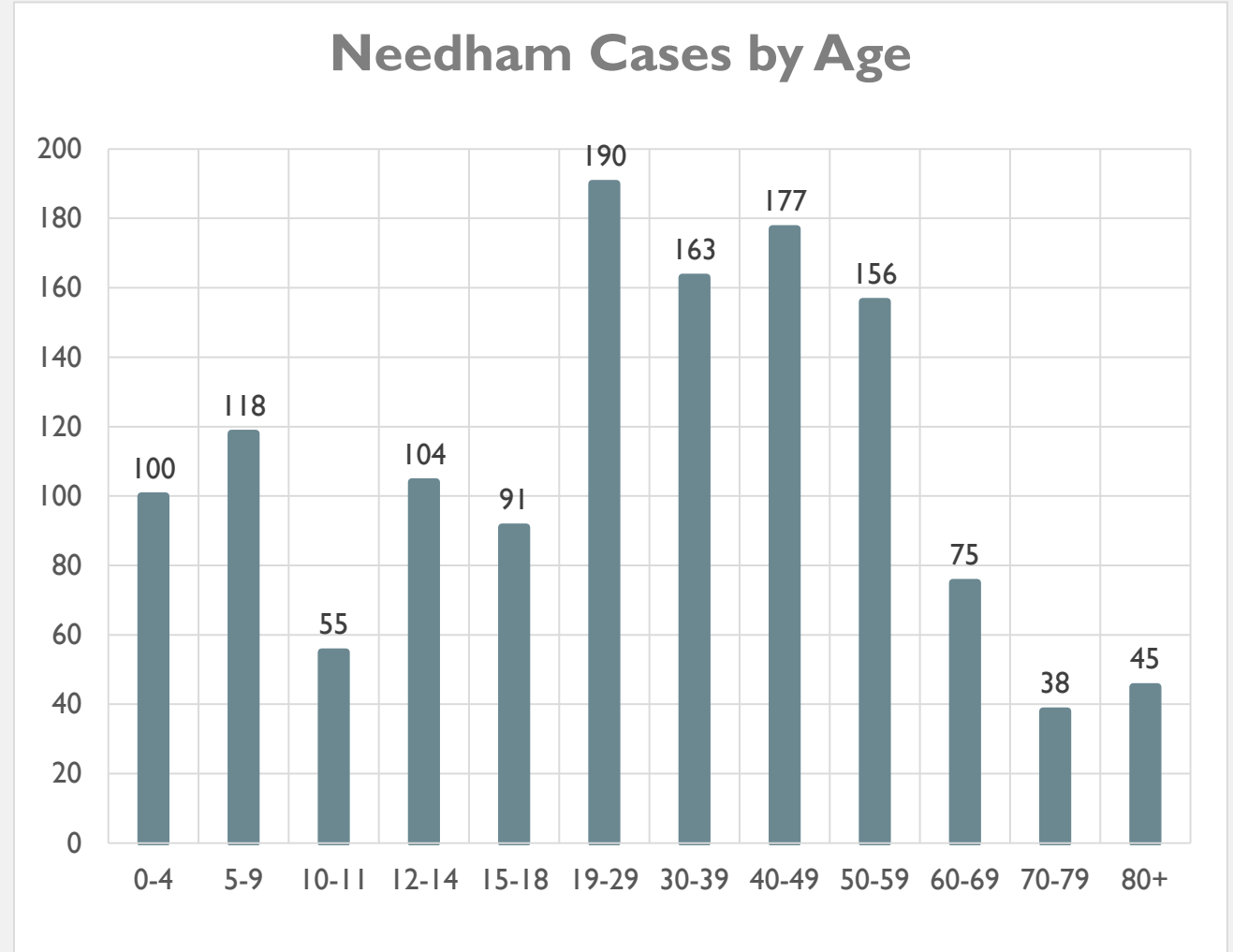


Data as of 1/12/22

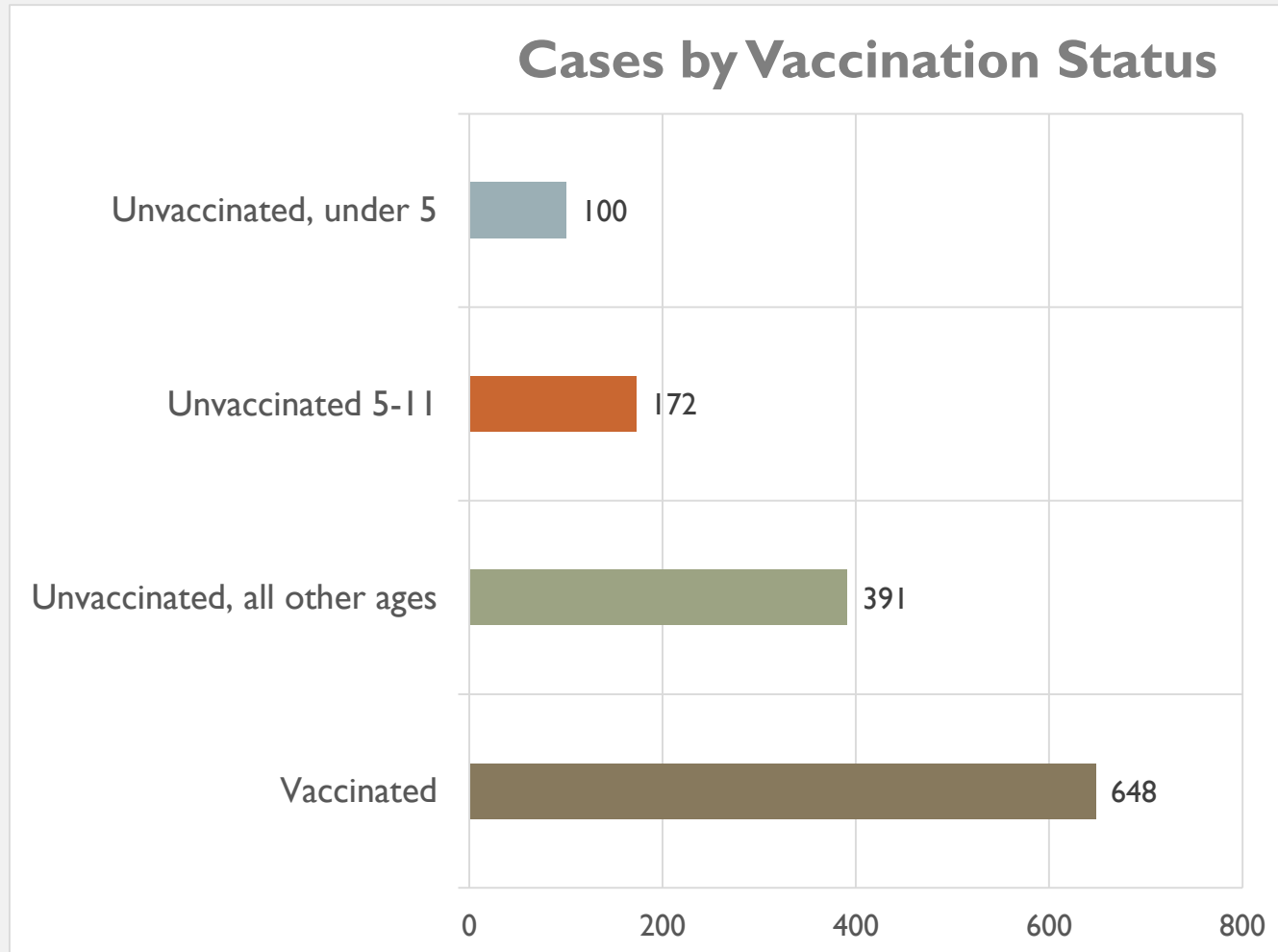
• NOTE: Does NOT include at-home tests

NEEDHAM: CASES BY AGE

1312 cases from December 15- January 12
Average Age: **32.81**



CASES BY VACCINATION STATUS, 12/15/21-1/12/22

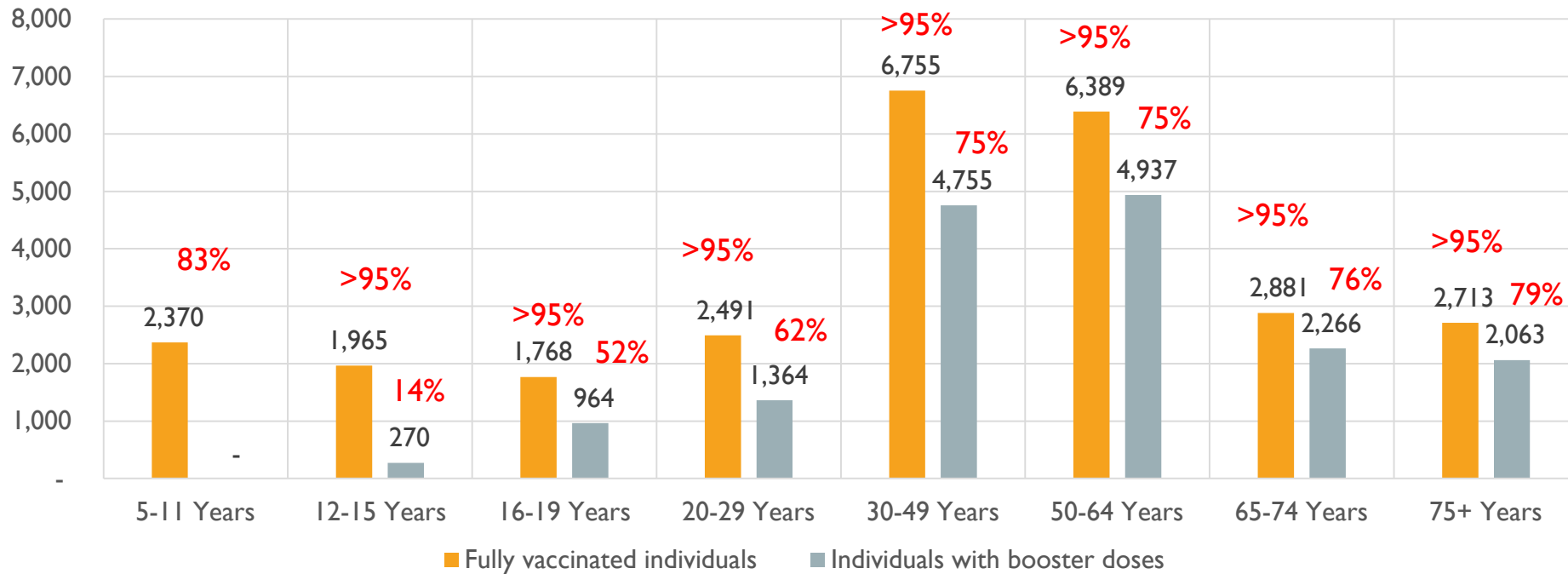


- 7% of population (unvaccinated) makes up half of cases
- ~2.4% of vaccinated residents tested positive for Covid-19 from 12/15-1/12
- NOTE: Vaccination data may not be accurate in reports, but there are too many cases to review each unvaccinated individual in MIIS

NEEDHAM VACCINATION AND BOOSTER RATE

93% of Needham residents are fully vaccinated; 57% have received booster doses

Needham Residents who are fully vaccinated and boosted





**4,144 Vaccines Administered
Since October 2021**

3,333 Covid-19 Vaccines

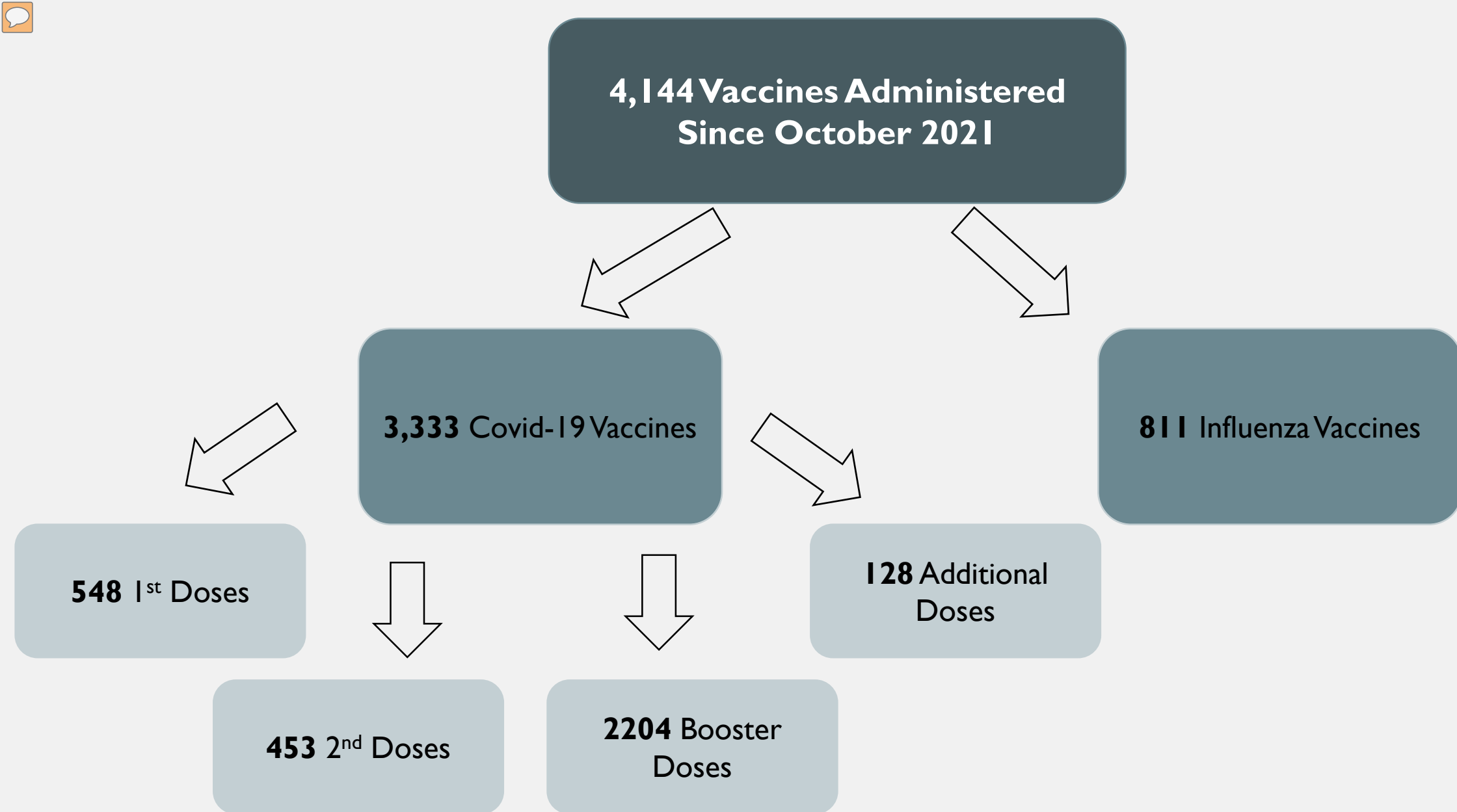
811 Influenza Vaccines

548 1st Doses

**128 Additional
Doses**

453 2nd Doses

**2204 Booster
Doses**



Vaccine Type	COVID-19	Influenza
<i>Collection Site Name</i>	<i>Count Distinct</i>	<i>Count distinct</i>
Center at the Heights Covid-19 Booster clinics	1,946	13
Needham Public Schools Covid-19 Vaccine Clinics	915	
Rosemary Recreation Complex	290	18
Olin College	89	
Kids 5-11 Years Covid-19 Clinic	75	
Temple Beth Shalom Staff Only	18	59
Center at the Heights 6+ regular dose		410
Center at the Heights 65+ higher dose		291
Needham Housing Authority 65+ higher dose		12
Needham Housing Authority (residents + staff only)		8
TOTAL	3,333	811

INDIVIDUALS VACCINATED FROM 24 STATES AND ~150 CITIES/TOWNS SINCE OCTOBER!



STATE TRENDS IN CASES AND HOSPITALIZATIONS

BREAKTHROUGH CASES MA

COVID-19 Cases in Fully Vaccinated Individuals

- COVID-19 cases in vaccinated people are counted as those who test positive more than 14 days after the final dose of vaccine*
- As of January 8, 2022 there were 5,120,310 fully vaccinated people and there were 262,060 cases in vaccinated people
- 4,553 of those 262,060 cases resulted in hospitalization and 1,054 cases resulted in death based on information reported to date

	Cumulative count through last week (reported 1/1/2022)	Cumulative count through this week (reported 1/8/2022)	% of All Fully Vaccinated Individuals*
Cases	179,594	262,060	5.1%
Hospitalizations among cases	3,909	4,553	0.09%
Deaths among cases	942	1,054	0.02%

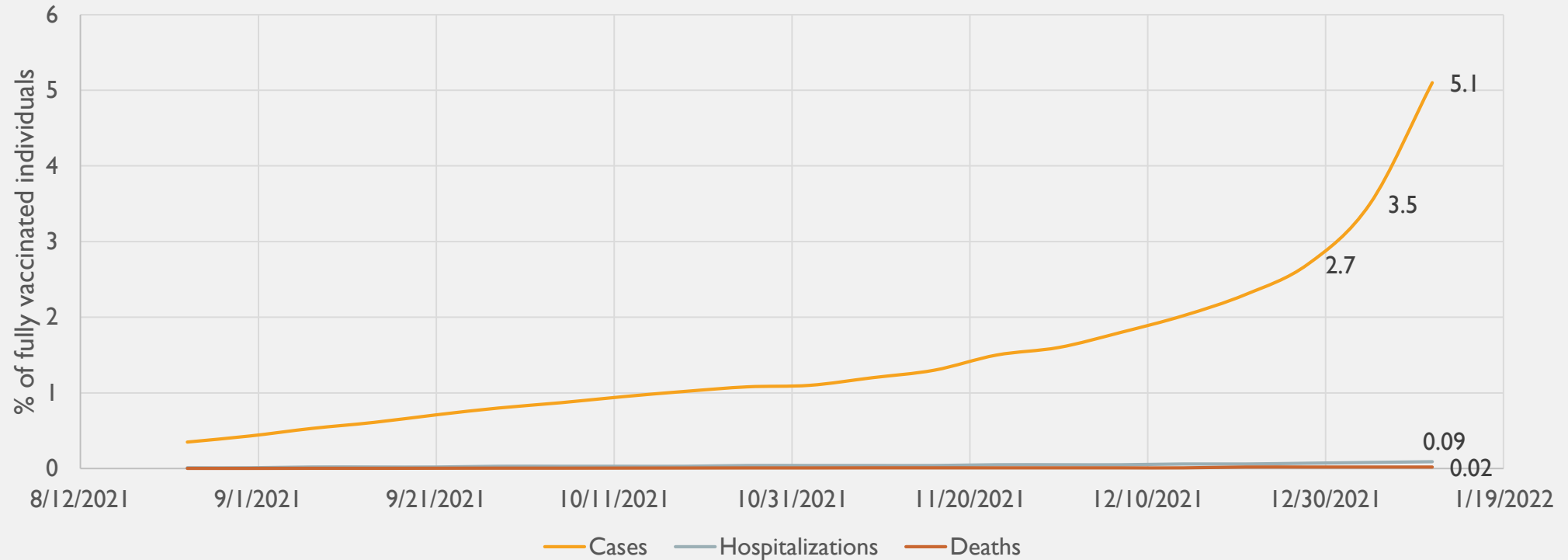
Note: Identification of cases in vaccinated people relies on matching data between the system of record for cases and vaccinations. The number of cases in vaccinated people may be undercounted due to discrepancies in the names and dates of birth of individuals, resulting in an inability to match records across systems. Hospitalization data is likely also undercounted as identification and reporting of hospitalized cases relies on that information being obtainable by case investigators through patient interview.

*Vaccination began December 14, 2020; the earliest date at which individuals would be considered fully vaccinated is January 19, 2021

Source: MIIS Data, MAVEN data

BREAKTHROUGH CASES, HOSPITALIZATIONS, DEATHS

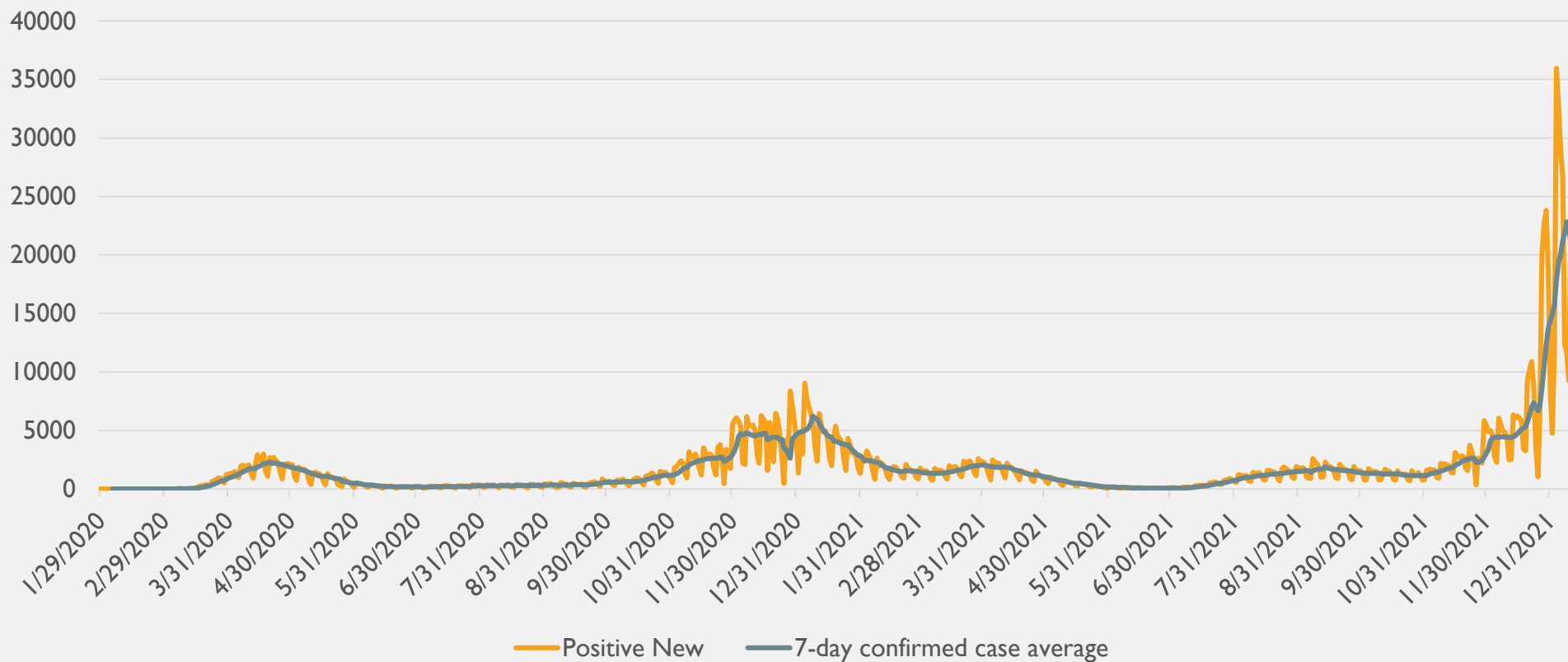
Covid-19 cases in fully vaccinated individuals



- Percent of vaccinated individuals who become infected;
- Percent of cases in vaccinated cases which resulted in hospitalization or death

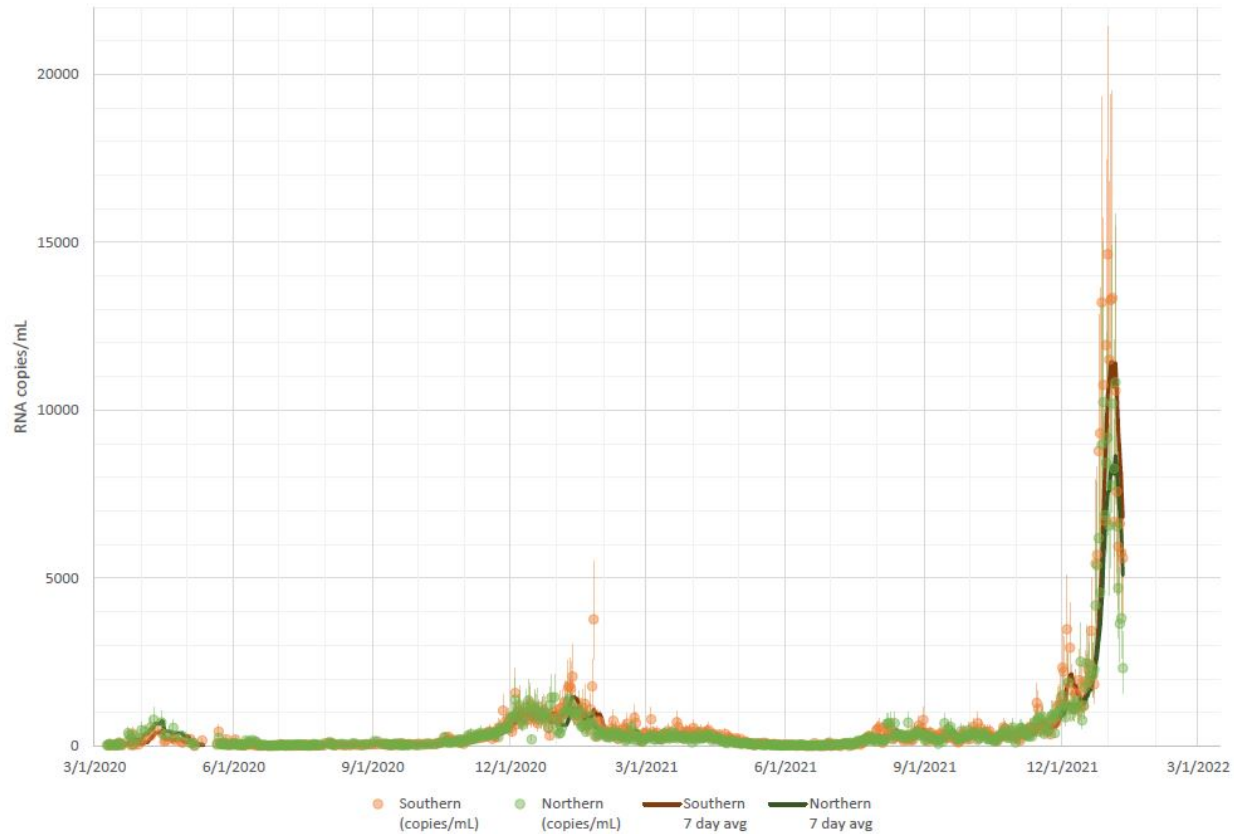
MONITORING OMICRON PEAK: MA NEW CASES

MA Daily New Cases

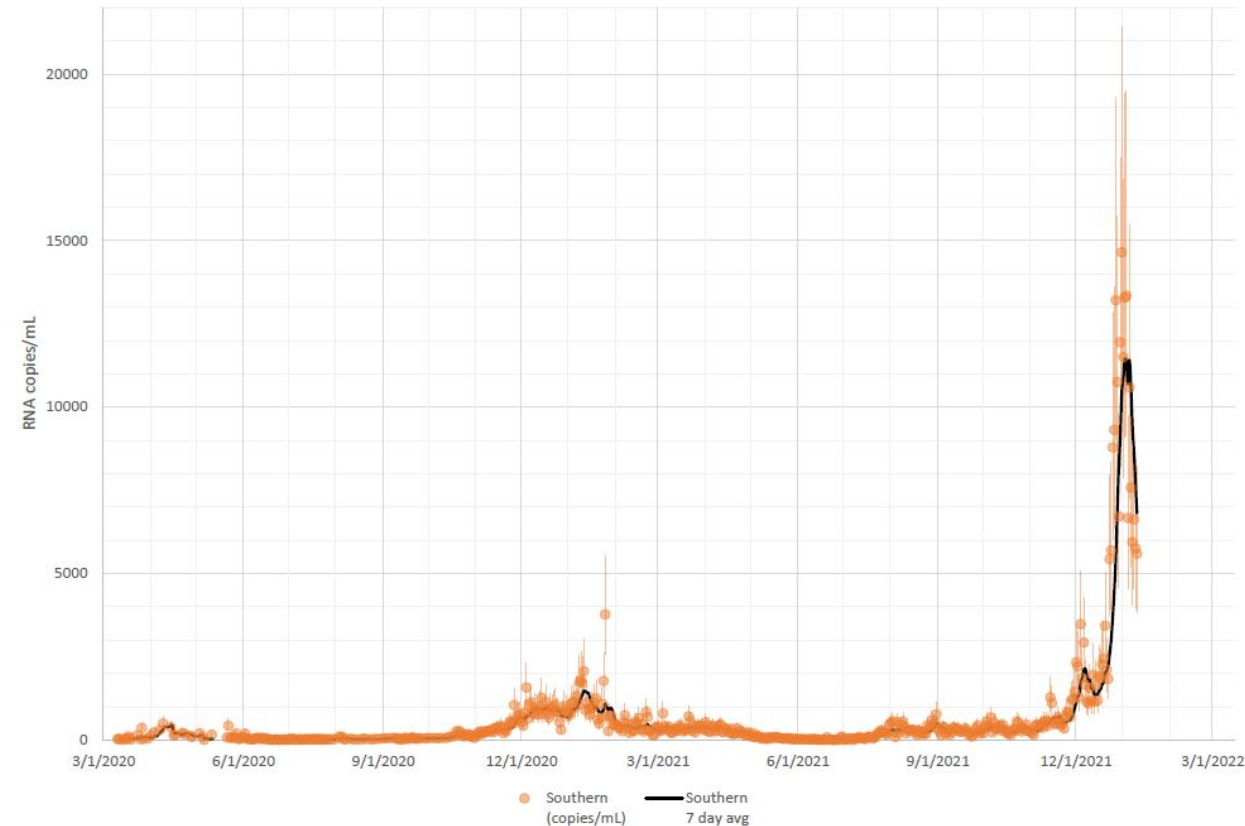


MWRA WASTEWATER MONITORING

DITP Viral RNA Signal by Date

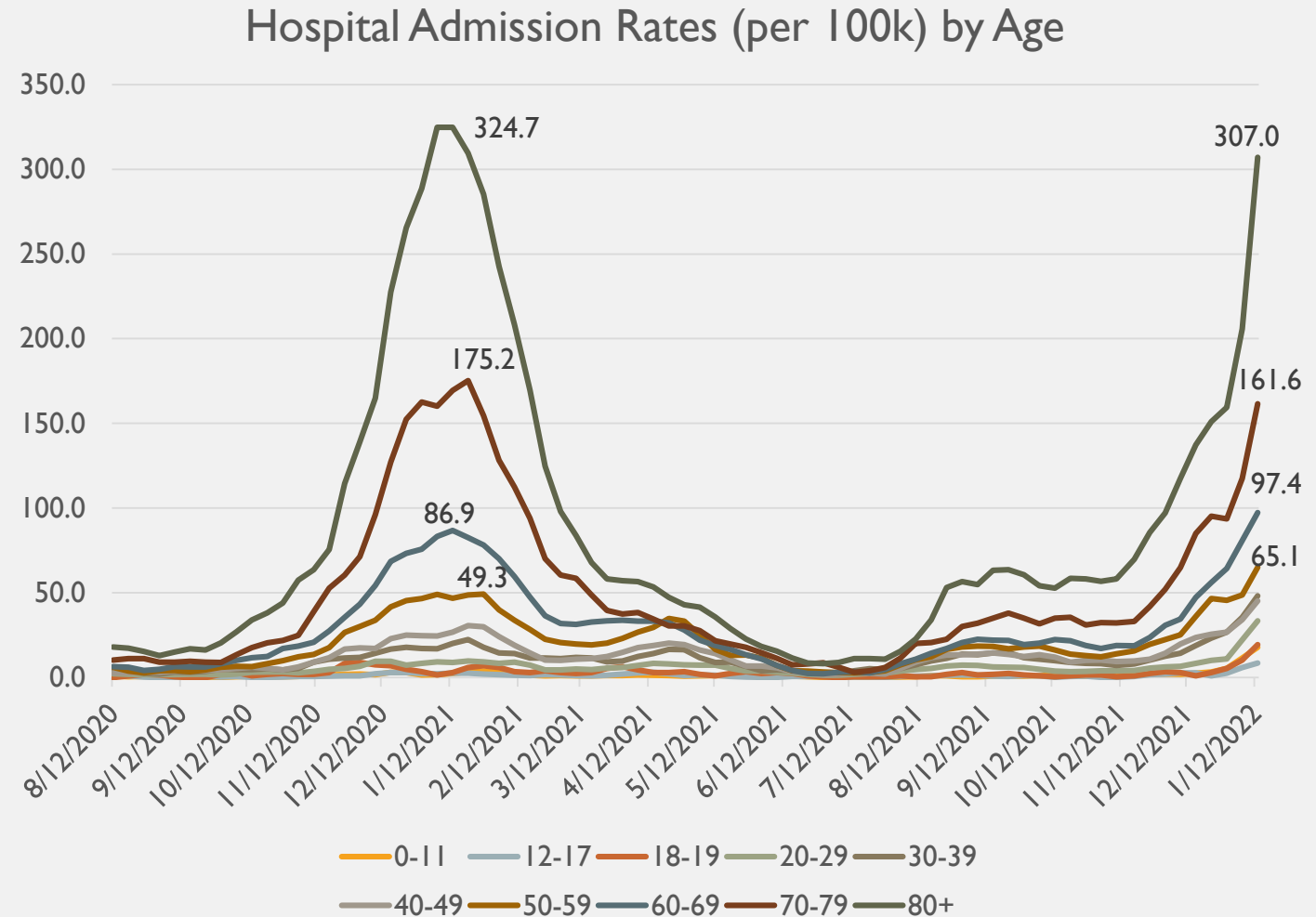


South System Viral RNA Signal by Date



MA HOSPITAL ADMISSION RATES (PER 100K) BY AGE

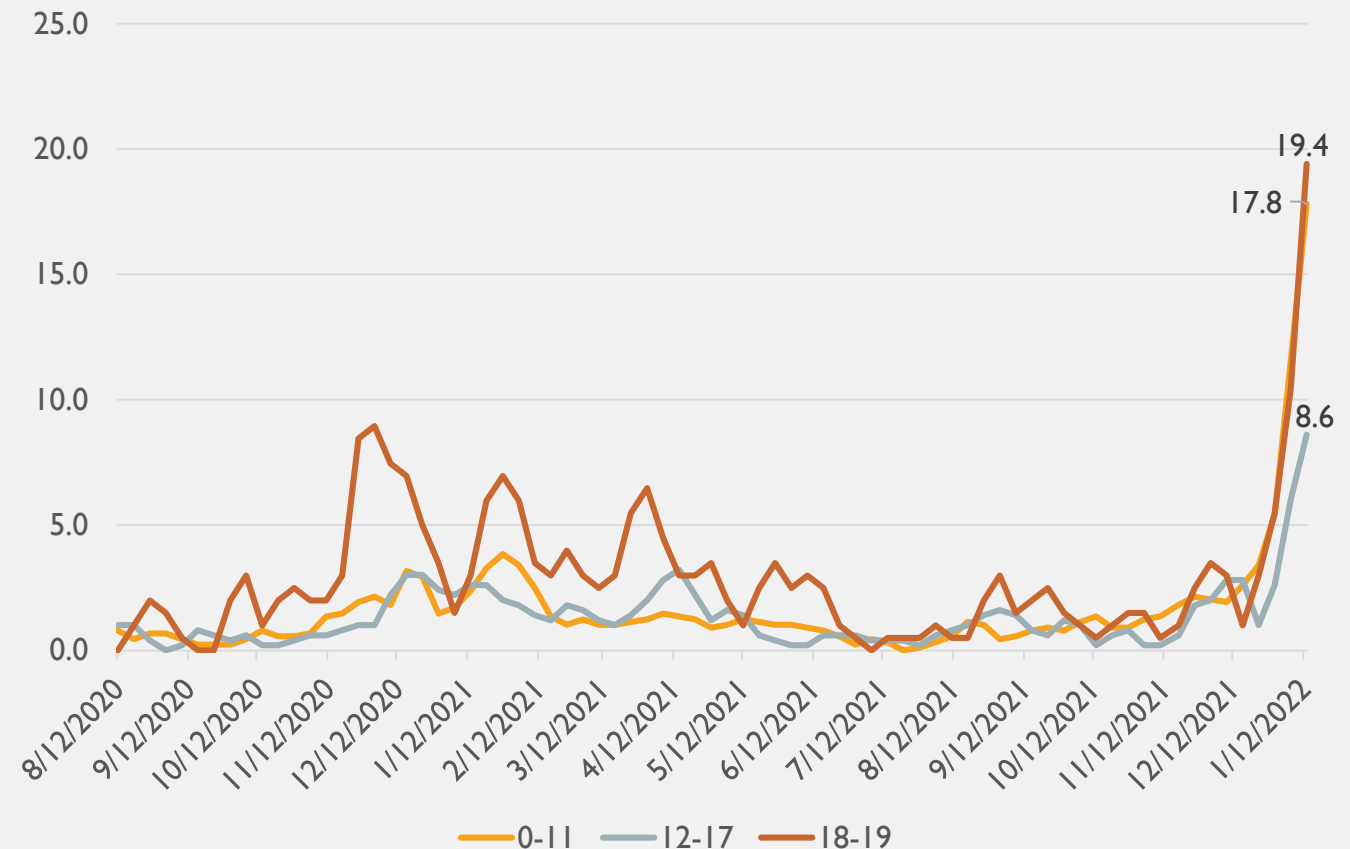
Age Group	Most recent (12/26/21- 1/8/22)	1 year ago (12/27/20- 1/9/21)
0-11	17.8	2.4
12-17	8.6	2.6
18-19	19.4	3.0
20-29	33.5	8.9
30-39	48.2	20.2
40-49	45.2	26.7
50-59	65.1	46.8
60-69	97.4	86.9
70-79	161.6	169.4
80+	307.0	324.7



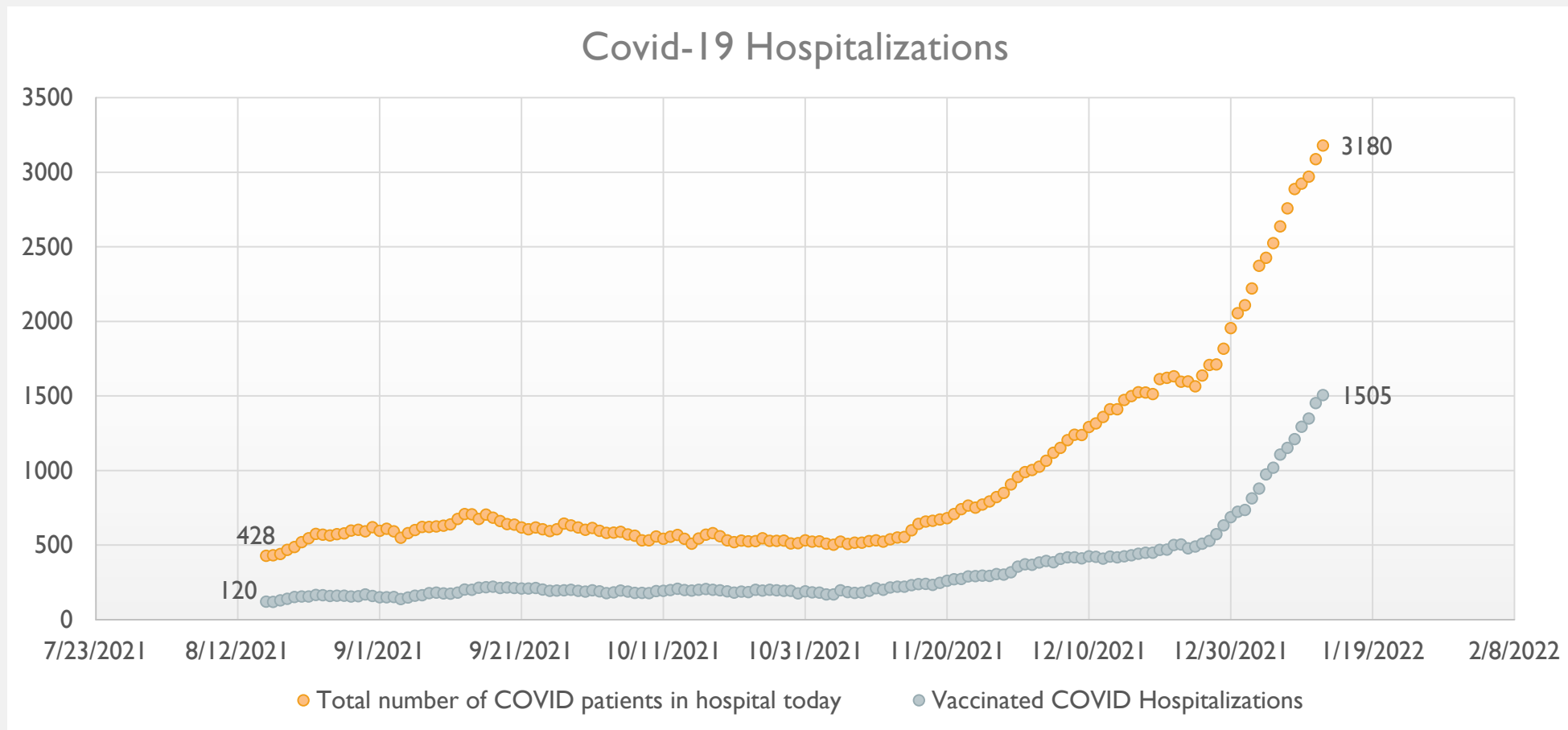
A CLOSER LOOK AT HOSPITALIZATION RATES IN AGES 19 AND UNDER

Age Group	Most recent (12/27/21- 1/9/22)	1 year ago (12/27/20- 1/9/21)
0-11	17.8	2.4
12-17	8.6	2.6
18-19	19.4	3.0

Hospital Admission Rates (per 100k), Ages 19 and Under



VACCINATED INDIVIDUALS IN HOSPITALS





J. Raymond Miyares Thomas J. Harrington Christopher H. Heep Donna M. Brewer Jennie M. Merrill
Bryan Bertram Ivria Glass Fried Alexandra B. Rubin Ethan B. Dively Maurica D. Miller Rian Rossetti

January 7, 2022

Eric Gold, Chief
Health Care Division
Attorney General's Office
1 Ashburton Place, 20th Floor
Boston, MA 02108

Re: Complaint Regarding Center for COVID Control, Needham MA

Dear Mr. Gold:

I serve as Town Counsel for the Town of Needham (the "Town"). The Town recently became aware that a COVID testing site doing business as "Center for Covid Control" has opened at a vacant storefront located at 1502 Highland Avenue. This business is operating on an extremely high-volume basis—there are lines stretching down the street every day—and Town officials have become aware of complaints that persons who have submitted to testing at this site are receiving results days or weeks later than promised, or sometimes not at all. The Company's website claims that PCR test results will be emailed within 48 hours, which appears to be generally inaccurate based upon reports from participants using this testing site.

The Center for Covid Control has numerous locations nationwide, and two others in Massachusetts¹, and on information and belief sends all of its samples, from all of its testing sites, to one laboratory. On information and belief, this business either knows or should know that it does not possess the capacity to timely deliver results to the volume of patients that it is accepting for testing at the 1502 Highland Avenue location.

An internet search indicates that the Better Business Bureau has received many complaints concerning the Center for Covid Control that are consistent with the concerns detected by Town officials. It also appears that California's Department of Public Health is currently investigating the Center for Covid Control.

¹ The other Massachusetts sites are located at 331 State Road in North Dartmouth and 462 Grafton Street in Worcester.

Eric Gold, Chair
Health Care Division
January 7, 2022
Page 2 of 2

This business opened without obtaining any permits or approvals from the Town, and I am currently unaware of any Town regulations that apply to this use. Nonetheless, the public expects that state and local government are exercising oversight over entities working in response to the COVID-19 pandemic, and members of the public that are using this business for COVID testing likely assume that it is operating with the imprimatur of governmental approval.

Therefore, on behalf of the Town of Needham, I request that your office review the Center for Covid Control's business practices, and consider whether it possesses all necessary regulatory authorization and is otherwise operating consistent with applicable law. The Town has also brought this matter to the attention of the Department of Public Health.

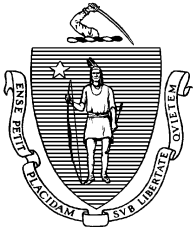
Thank you very much for your consideration of this matter, and please contact me if you would like to discuss this further.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Christopher H. Heep', with a stylized, flowing script.

Christopher H. Heep

cc: Kate Fitzpatrick, Town Manager



The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
250 Washington Street, Boston, MA 02108-4619

CHARLES D. BAKER
Governor

KARYN E. POLITO
Lieutenant Governor

MARYLOU SUDDERS
Secretary

MARGRET R. COOKE
Acting Commissioner

Tel: 617-624-6000
www.mass.gov/dph

January 13, 2022

Center for COVID Control
1502 Highland Ave.
Needham, MA 02492

Center for COVID Control
1 Acton St.
Worcester, MA 01604

Center for COVID Control
331 State Rd.
North Dartmouth, MA 02747

Re: Center for COVID Control Licensure- CEASE UNLICENSED ACTIVITY
IMMEDIATELY

Sent via email to: press@centerforcovidcontrol.org; lab@dcltesting.com

To Whom It May Concern:

I am writing regarding Massachusetts Department of Public Health ("the Department") licensure requirements for clinical laboratories, as they are applicable to Center for COVID Control.

M.G.L. c. 111D, section 4 explicitly states that "no person shall maintain a clinical laboratory in the commonwealth apart from a hospital or clinic licensed under section fifty-one of chapter one hundred and eleven, unless he holds, and there is in effect, a license issued under section five" unless an exemption is met. M.G.L. c. 111D, section 1 defines a clinical laboratory as "a facility or place, however named, the purpose of which is to make biological, serological, chemical, immuno-hematological, cytological, pathological, or other examinations of materials derived from a human body."

It is the Department's understanding that Center for COVID Control is offering and providing COVID-19 rapid and PCR testing in Massachusetts, including locations in Needham, Worcester, and North Dartmouth, according to your website. Further, the Department has received specific reports regarding onsite collection of specimens collected through nasal swabs at the Needham and North Dartmouth locations. Specifically, regarding rapid testing, reports indicate that

examination of the specimens collected were done onsite and reported to patients shortly after the patient being tested was given a nasal swab.

You must immediately cease providing all services that require clinical laboratory licensure by the Department.

These activities cannot resume unless and until you are licensed by the Department to provide such clinical laboratory services. For your reference, a complete copy of the clinical laboratory program licensure may be found online at:

<https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXVI/Chapter111D> and <https://www.mass.gov/doc/105-cmr-180-the-operation-approval-and-licensing-of-clinical-laboratories/download>.

If you disagree with the Department's assertion and Center for COVID Control 1) is not providing services that would be subject to licensure by the Department or 2) believes that Center for COVID Control holds a valid license that would permit these activities to continue, please reach out to Pamela Waksmonski at pamela.waksmonski@mass.gov. However, unless and until the Department has determined that you have a valid license, you may not resume testing.

Sincerely,

Rebecca Kaye

Rebecca Kaye

Deputy General Counsel

Department of Public Health

January 13, 2022

FOR IMMEDIATE RELEASE

Press@centerforcovidcontrol.org

CENTER FOR COVID CONTROL TO PAUSE OPERATIONS FOR ADDITIONAL STAFF TRAINING AND EDUCATION

*Omicron Variant Surge Pressing Nation's Largest Covid-19 Testing Center
Operator's Test Production, Staffing Capabilities, One Week Closure Announced*

Omicron Variant · COVID-19 · COVID Tests · Rapid Test · PCR Tests
Pandemic Containment · Drive Through Testing Centers · Quality Assurance ·
Testing Accuracy Timely Reporting of Test Results · CLIA Certified
Laboratory · Omicron Peak

January 13, 2022 (Rolling Meadows, IL) - Certain **Center for Covid Control (CCC)** locations are experiencing high demand for testing due to the Omicron variant surge. This unusually high patient demand has stressed staffing resources, as has been widely reported, in a subset of our locations, affecting our usual customer service standards and diagnostic goals.

CCC acknowledges this operational strain on customer access and delivery of results/status in some locations and remains determined to provide accurate, trusted testing for our thousands of customers. To this end, and to ensure the highest customer service and diagnostic quality, the company is announcing today it will temporarily pause further collection of patient specimens effective Friday, January 14, 2022, with plans to reopen Saturday, January 22, 2022.

"Center for Covid Control is committed to serving our patients in the safest, most accurate and most compliant manner. Regrettably, due to our rapid growth and the unprecedented recent demand for testing, we haven't been able to meet all our commitments," said CCC founder and CEO Aleya Siyaj.

"We've made this difficult decision to temporarily pause all operations, until we are confident that all collection sites are meeting our high standards for quality."

CCC will use this operational pause for additional staff training in sample collection and handling, a refocus on customer service and communication practices, and ensure compliance with regulatory guidelines.

Siyaj continued, “CCC was founded to meet a critical market need to establish testing centers where COVID tests could be provided to patients rapidly and safely to minimize delay, and let people get on with their daily activities.”

CCC is one of the first testing centers that required no appointments, and accepted all walk-in patients, as well as accepting most insurance and uninsured patients. Over the last few weeks, the daily number of COVID tests that CCC has collected nationwide has increased from 8,000 per day nationwide, to a dramatic spike of more than 80,000 per day, equating to most individual testing sites seeing an overwhelming 10x increase in patients.

A key contributing factor to CCC’s present customer service challenges is the rapid spread of the Omicron variant within our highly valued, 3,000 frontline staff members at an extreme rate, creating an even more inopportune situation. This staffing challenge has impacted patient wait times, consistent opening hours and delays on reporting test results.

“For this, we truly apologize and are committed to resolve these recent customer inconveniences and loss of confidence,” added Siyaj.

This period of employee training and management enhancements are intended to refocus CCC staff on its corporate mission of being the leading national provider of accessible, convenient, affordable, accurate and trusted Covid testing.

“CCC is a dynamic, fast-growing company providing vital services and we want to thank our customers and employees as we re-commit to exceptional customer service, enhance quality assurance, and ensure we are exceeding regulatory sample collection and clinical guidelines,” said Siyaj.

CCC is also responding to queries from several public health and regulatory agencies.

Patient samples collected today, as well as other patients awaiting results, will be carefully processed today and tomorrow and results provided in a timely fashion.

Customers and stakeholders with questions and concerns about a particular collection site or company practice are encouraged to send an email to compliance@centerforcovidcontrol.org.

###

About Center for Covid Control: CCC is a privately-held Illinois-based operator of COVID testing center sites. The company was established in 2020 to address a critical need for COVID-19 testing and has gained recognition as one of the largest testing center operators in the country. CCC markets and manages more than 300 test collection sites -- both brick-and-mortar locations and drive through testing sites -- across the U.S. CCC accepts most health insurance and accepts uninsured patients. CCC primarily uses the CLIA certified laboratory, Doctors Commercial Laboratories (registration #14D0988472), as a clinical testing vendor partner. The company and its affiliated site operators employ more than 3,000 Americans. www.centerforcovidcontrol.org



Board of Health

Kathleen Ward Brown, ScD

Edward Cosgrove, PhD

Stephen Epstein, MD, MPP

Christina S. Mathews, MPH Robert Partridge, MD, MPH

Public Health Emergency Order Mandating Mask Usage in Select Municipal Locations

Whereas, on March 10, 2020, Massachusetts Governor Charles D. Baker, acting pursuant to the powers provided by Chapter 639 of the Acts of 1950 and Section 2A of Chapter 17 of the General Laws, declared a state of emergency in the Commonwealth of Massachusetts due to the outbreak of the 2019 novel Coronavirus (COVID-19, or SARS-CoV2 virus); and

Whereas, the Select Board of the Town of Needham issued a local Declaration of Emergency on March 20, 2020; and

Whereas, current scientific understanding is that the SARS-CoV2 virus can be transmitted both by asymptomatic and symptomatic cases;¹ and

Whereas the SARS-CoV2 virus is transmitted through both aerosols and droplets; and

Whereas, scientific evidence supports the use of masks to reduce transmission;² and

Whereas, the Board of Health of the Town of Needham is vested by M.G.L. c. 111, § 104³ with the authority and responsibility to prevent the spread of infection; and

Whereas, the Board of Health of the Town of Needham is given authority to enact emergency orders by 310 C.M.R. 11.05;⁴ and

¹ <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/how-covid-spreads.html>

² National Academies of Sciences, Engineering, and Medicine 2020. Rapid Expert Consultation on the Effectiveness of Fabric Masks for the COVID-19 Pandemic (April 8, 2020). Washington, DC: The National Academies Press. <https://doi.org/10.17226/25776>.

³ M.G.L. § 104 provides: "If a disease dangerous to the public health exists in a town, the selectmen and board of health shall use all possible care to prevent the spread of infection..."

⁴ 310 C.M.R. 11.05 states: "Whenever an emergency exists in which the interest of protecting public health ... requires that ordinary procedures be dispensed with, the board of health or its authorized agent, acting in accordance with the provisions of M.G.L. c. 111 §30, may, without notice or hearing, issue an order reciting the existence of the emergency and requiring that such action be taken as the board of health deems necessary to meet the emergency."

Whereas, the Board of Health of the Town of Needham is vested by M.G.L. c. 111, § 31⁵ with the authority and responsibility to make reasonable health regulations; and

Whereas, the Board of Health of the Town of Needham is vested by M.G.L. c. 111, § 122 to examine and destroy, remove, or prevent causes of sickness;⁶

Now therefore, the Board of Health of the Town of Needham does hereby order the following:

All person's age five and older shall wear a mask⁷ at all times when indoors at select municipal locations where priority or high-risk populations (such as young children and senior citizens) gather. These locations include the Center at the Heights, the Needham Free Public Library, the Rosemary Recreation Complex, and any other locations where Town departments might hold classes or programs for those populations (for instance, a Park & Recreation exercise program for seniors regardless of physical location).

This Emergency Order shall not apply to anyone under the age of five, anyone who has trouble breathing, or is unconscious, incapacitated, or otherwise unable to remove the mask without assistance, and/or any other person exempted by Center for Disease Control & Prevention guidelines or Massachusetts Department of Public Health guidelines. Those who are unable to safely don a mask due to access or functional needs should not wear one.

This Emergency Order shall not reduce or eliminate the importance of not entering these spaces if experiencing even mild symptoms.⁸ The use of a mask should be combined with social distancing, when possible, and frequent handwashing and refraining from touching one's face. The use of a mask is NOT intended to replace those activities but rather to supplement them.

This Emergency Order does not require the use of a mask in outdoor settings.

Nothing in this order is intended to encourage residents to act as an enforcement authority for the Town of Needham. Residents should not take it upon themselves to

⁵ M.G.L. § 31 provides: "Boards of health may make reasonable health regulations."

⁶ M.G.L. § 122 provides: "'The board of health shall examine into all nuisances, sources of filth and causes of sickness within its town, or on board of vessels within the harbor of such town, which may, in its opinion, be injurious to the public health, shall destroy, remove or prevent the same as the case may require, and shall make regulations for the public health and safety relative thereto...'"

⁷ It is strongly recommended that all residents of Needham use a high-quality mask (surgical grade quality or higher equivalent to KN-95, for example) in publicly-accessible indoor settings.

⁸ <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>

approach people in violation of this order. Residents are urged to focus solely on their personal and family compliance with this order.

This emergency order took effect on Thursday January 6, 2022 at 6:01 a.m. The Emergency Order shall remain in effect until notice is given, pursuant to the Board of Health's judgement, that the Public Health Emergency no longer exists.

To the extent necessary, this Order shall be enforced by the Director of Health & Human Services and others he chooses to empower as agents of the Board of Health.

ORDERED by vote of the Needham Board of Health on January 5, 2022, by,



Kathleen Ward Brown, ScD



Edward Cosgrove, PhD



Stephen Epstein, MD,
MPP



Christina S. Mathews, MPH



Robert Partridge, MD, MPH

From: Greg Reibman <greibman@charlesriverchamber.com>
Sent: Wednesday, January 12, 2022 6:30 PM
To: mcdonald@needhamma.gov; Health Department
Cc: Tara Gurge; Kate Fitzpatrick; Amy Haelsen; Matt Borrelli
Subject: Letter to the Needham Board of Health re face masks

Dear Needham Board of Health:

I'm writing on behalf of the Charles River Regional Chamber's [Board of Directors](#) to urge the Needham Board of Health to adopt a temporary face mask requirement in all indoor public spaces, such as, but not limited to grocery stores, retail stores, restaurants, event spaces and salons.

The chamber appreciates that the science of COVID is changing rapidly. We applaud your board's efforts to lead by educating the public about the need to wear masks properly, as well as the latest thinking on proper masking materials.

However, we believe a temporary mask mandate achieves several things that mask advisories do not.

1. It provides a safer and more comfortable work environment for our workers and their families. While Needham enjoys a high residential vaccine rate, many employees in many of our places of employment do not live in town.
2. It takes the onus off our businesses and their employees to enforce their own mask policies and the difficult conversations that can accompany those conversations.
3. It gives customers who believe strongly in the value of face coverings (and anecdotally that appears to be the vast majority of residents) an added degree of comfort when shopping or dining in Needham (and perhaps reduces the temptation to take their business to Newton, West Roxbury or another community that has a mask mandate).

Consumer confidence is low. Workers are exhausted and fearful. Employers are struggling with absentee rates never seen before. The chamber believes a temporary mask mandate -- coupled with stepped up safety protocols and education, continued advocacy of vaccines, etc. -- would help foster a more comfortable and safer workplace for all.

Thanks to you and your colleagues for all you are doing to keep us safe.

Greg Reibman | President



[Charles River Regional Chamber](#) (formerly Newton-Needham Chamber)
617.244.1688

Schedule time with me at https://calendly.com/greg_reibman



**Board of Health
TOWN OF NEEDHAM
AGENDA FACT SHEET**



MEETING DATE: 1/20/2022

Agenda Item	Proposed changes to Board of Health Article 20 as requested from Sira Naturals RMD
Presenter	Lynn Schoeff, Professional Technical Support Specialist

1.	BRIEF DESCRIPTION OF TOPIC TO BE DISCUSSED
In a letter dated September 17, 2021 to Timothy McDonald, the Director of Health and Human Services, Sira Natural RMD requested the following changes to Article 20 of the Board of Health regulations: 1. Revise 20.6.5 to allow coupons and discounts sale including promotional gifts and materials with references to marijuana or MIPs, including the logo of Sira Naturals, Inc. d/b/a Ayr. Thus, we request the BOH amend regulation 20.6.10 (A) to allow the logo of Sira Naturals, Inc. d/b/a Ayr and brand. 2. Amend 20.6.10 to allow the logo of Sira Naturals on promotional items and materials. 3. Change its policy of requiring approval of edible packaging before allowing sales. 4. Discontinue the requirement to submit CORI reports now that the Cannabis Control Commission has that requirement. A full summary of these requests and recommendations from the Public Health Division follows this document.	
2.	VOTE REQUIRED BY BOARD OF HEALTH
Vote is required.	
3.	BACK UP INFORMATION ATTACHED:
Letter from Sira Naturals, dated September 17, 2021, from Dwan Packnett, VP Gov't Relations & Community Investment Medical Marijuana Summary, dated January 12, 2022, from the Needham Public Health Division	



September 17, 2021

Mr. Timothy Muir McDonald
Director of Public Health
Needham Board of Health
178 Rosemary Street
Needham, MA 02494

RE: Sira Naturals, Inc. Request to Appear before the Needham Board of Health

Founded and operated by Massachusetts natives and residents since 2013, Sira Naturals weathered the unpredictable cannabis market to become one of the state's largest employers and vertically integrated cultivator, product manufacturer, and retailer of cannabis products for both the medical and adult-use markets in Massachusetts. Through a Community Benefits Agreement (CBA) signed by the Needham Board of Selectmen on June 14, 2016; the Special Permit granted by the Needham Planning and Community Development Department on June 13, 2017; and subject to the provisions of Article 20 of the Board of Health (BOH) Regulations effective March 31, 2016; Sira Naturals opened a retail medical facility at 27-29 Franklin in the Town of Needham in June 2017.

Sira Naturals seeks the Board of Health's reconsideration of Article 20 BOH Regulations governing discounted products and labeling, signage and other materials more particularly described below. The medical cannabis industry has had no detrimental impacts in the Commonwealth of Massachusetts since its introduction in 2013. And the medical marijuana industry has undergone significant technological improvements such as state monitored seed to sale Metric Tracking systems allowing data visibility to retailers across the state allowing a safe and reliable distribution to and accessibility for medical marijuana patients.

Such accessibility, however, is not available for cost-conscious consumers or those living on a fixed income who enjoy discounts similar to those provided every day at local pharmacies like Walgreens, CVS, or Walmart. The failure to provide discounts can become a barrier to use that reinforces the "illegal" stigma of cannabis. We believe promotional discounts will help to relieve this stigma by providing a more welcoming environment - similar to any pharmacy - for those marginalized by the war on drugs.



Thus, we request the BOH remove or amend regulations 20.6.5 (B) and (C) set forth below so Sira may provide discounts and loyalty programs to Needham residents.

1. 20.6.5 Registered Sales by Registered Marijuana Dispensary

B. No person shall Accept or redeem, offer to accept, or redeem, or cause or hire any person to accept or redeem, or offer to accept or redeem, through any coupon or other method, any marijuana or marijuana-infused product for less than the listed or non-discounted price; or

C. Sell marijuana or a marijuana-infused product through any discounts (e.g., “buy-two-get-one-free”) or otherwise provide any marijuana or marijuana-infused product for less than the listed or non-discounted price in exchange for the purchase of any other product.

Sira Naturals also requests the BOH allow us to discount products for sale including promotional gifts and materials with references to marijuana or MIPs, including the logo of Sira Naturals, Inc. d/b/a Ayr. Thus, we request the BOH amend regulation 20.6.10 (A) to allow the logo of Sira Naturals, Inc. d/b/a Ayr and brand.

2. 20.6.10 Marketing and Advertising Requirements

A. A RMD may develop and use a logo for labeling, signage, and other materials, but that logo may not contain medical symbols, images of marijuana and marijuana-related paraphernalia, or colloquial references to cannabis and marijuana. Likewise, a RMD may not offer for sale or as a promotional gift any items which contain symbol of or references to marijuana or MIPs, including the logo of the RMD.

Finally, while not specifically listed in Article 20, Sira Naturals is currently required to send all edible packaging to the Needham Board of Health for pre-approval before being offered for sale to patients. Since packaging and labelling is currently regulated by the Cannabis Control Commission, we would like to request amending this municipal specific requirement.

Sira is prepared to highlight specific data that shows the potential anticipated benefits of easing these restrictions and would very much like to review additional requirements such as background checks and CORIs reviewed by the Needham BOH that may have worked theoretically and before the CCC was established. But now after four years of practice with excellent outcomes, we are confident this heightened level of scrutiny has become burdensome to both Sira Naturals and the Needham BOH and is no longer needed in every instance.



Thank you for your consideration. If you have any questions, or if additional information is needed, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Dwan Packnett". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Dwan Packnett
VP Gov't Relations & Community Investment

cc: Kate Fitzpatrick, Needham Town Manager
David Davis, Needham Director of Finance
Matthew Radebach
Louis Karger
Michelle Foley
Andrea Odian



NEEDHAM PUBLIC HEALTH DIVISION



TO: Needham Board of Health
FROM: Tara Gurge, Assistant Director of Public Health
Tiffany Zike, Assistant Director of Public Health
DATE: January 12, 2022
SUBJECT: Summary, Questions, and Recommendations for the Board of Health

At its October 14, 2021 meeting, the Board of Health requested that the Public Health Division provide a summary of the regulation on medical marijuana dispensaries. In addition to the summary, this document reviews Sira Natural's request for changes to the regulation, some questions for the BOH to consider, and recommendations regarding possible changes to the regulation.

* * * * *

Part 1: Summary of Needham Board of Health Article 20:

Regulation to Ensure the Sanitary and Safe Operations of Registered Marijuana Dispensaries and the Sale of Marijuana to Persons with Documented Medical Needs

SECTION 20.1 AUTHORITY

Authority to set regulations

SECTION 20.2 PURPOSE

To provide local oversight and inspection of marijuana treatment centers (MTC), formerly known as registered marijuana dispensaries (RMD) and hardship cultivation.

SECTION 20.3 DEFINITIONS

SECTION 20.4 PERMIT TO OPERATE A REGISTERED MARIJUANA DISPENSARY

20.4.1 Permit to Operate

This section includes requirements such as being registered with the Cannabis Control Commission, plan reviews, fees, and business hours.

20.4.2 Inspections and Compliance

Establishes periodic, unannounced inspections. Includes several human resource requirements (CORI and SORI),¹ registration of all staff, staffing, and training). The section also includes providing the BOH with staffing, training, and security including updates when any of those plans change.

¹ See Part 2

20.4.3 Records

This section includes a requirement for the MTC to report to the BOH about visits and communication with the Cannabis Control Commission (CCC); required surveillance; and record retention.

20.4.4 Other Restrictions for MTCs

Any onsite cultivation will not affect health or safety of neighbors. No alcohol, tobacco, or lottery sales. No license to serve food or drink.

20.5 PLAN REVIEWS

20.5.1 Off-site cultivation or preparation of Marijuana-Infused Product (MIP)

To sell MIPs: submit plan for review of processing, preparation facilities, production, etc. regardless of where the facility is located

20.5.2 MIP storage and handling

Required to submit plan for storage, handling, and sale locations within RMD. Review may include inspection. This section also has specific requirements for labeling MIP including disallowing photos or images of food on product labels. It also requires that “MEDICAL MARIJUANA” appear on all edible packaging.²

20.5.3 Waste disposal

Required to submit plan for disposal of waste or damaged product per MDPH rules.

20.5.4 Emergencies and Continuity of Operations

Must have (and submit to NPHD for review) detailed emergency operations plan, and continuity of operations plans.

20.5.5 Safety and Security Plan

Per MDPH, develop a comprehensive security plan.

20.6 MARIJUANA SALES

20.6.1 – 20.6.4

Display a sign requiring registration card for entry and staff verify registration card. Only face-to-face retail sales unless home delivery has been approved

20.6.5 No person shall:

- Distribute free samples

² See Part 2

- Accept coupons for less than listed price³
- Sell products through discounts in exchange for other purchases
- EXCEPT for demonstrable financial hardship⁴
- No self-service, vending machines, or roll-your-own machines.

20.6.9 Restrictions

- Sira must not encourage marijuana use for anything other than medical purposes.

20.6.10 Marketing and advertising

- May have a logo for labeling which may not include medical symbols, images of marijuana and paraphernalia. May not offer promotional items with references or images of marijuana....including the logo of the RMD⁵.
- Limits on signage, displays
- (F) List of prices can be given to customer, but only on request. No advertising of prices (state says list or prices can be posted inside the dispensary and on the website)⁶

20.7 Home Cultivation

20.7.2 Individual must have home permit

Permits are granted only if individual has no means of getting to RMD or has verified financial hardship.

20.7.3 Must meet physical requirements for home cultivation and only in limited quantity.

20.7.4 Requirements for receiving a home permit include inspection, secure location, limits on amount cultivated.

SECTION 20.8 VIOLATIONS

Minor and major violations and penalties

SECTION 20.9 ENFORCEMENT

SECTION 20.10 SEVERABILITY

SECTION 20.11 EFFECTIVE DATE

³ See Part 2

⁴ Sira's letter implies that people experiencing financial hardship will benefit from sales or coupons, yet this allowance exists in the current regulation.

⁵ The state regulation allows the logo "on labels, signage, and other materials". The justification for disallowing logo on promo items in Needham is not clear.

⁶ Although this is not identified as an issue for Sira, the rationale for disallowing posted prices in Needham is not clear.

Part 2: Addressing Sira Natural's Requests

Sira Natural's letter (dated September 17, 2021) to Timothy McDonald, the Director of Health and Human Services, included the following requests.

1. Request:

Revise 20.6.5 to allow coupons and discounts. Their argument is that not allowing such coupons and discounts hurts "cost-conscious consumers or those living on a fixed income". They also state that promotional discounts at pharmacies are no different from the discounts they would like to offer.

Response:

At the meeting on September 23, 2021, Board of Health members discussed pharmacy practices of discounting non-prescription items rather than prescription drugs. While there are some [senior prescription discount](#) programs that are specifically designed for low-income older adults, there do not appear to be any pharmacies that offer coupons or discounts for prescription medication.

The Board of Health already permits Sira Naturals to offer lower prices for low income individuals.

Also at the September 23 meeting, Ms. Dwan Packnett offered a different reason for requesting the revision, which was so that Sira Naturals could be competitive with medical marijuana dispensaries in neighboring towns.

As implied in Ms. Packnett's concerns about competitive prices in other towns, one possible consequence of disallowing coupons and discounts is that it might inadvertently cause Needham residents to drive further, albeit just a few miles, to take advantage of savings opportunities elsewhere.

Recommendation:

Public Health Division staff recommends that 20.6.5 remains as is. Medical dispensary patrons are already receiving better prices than they would at highly taxed recreational marijuana stores. As is appropriate, the Board of Health considered medically dispensed cannabis as they would other prescription drugs. Additionally, the Board should not address the competitive aspects of marijuana establishments.

2. Request:

Sira Naturals requested that the Board of Health amend 20.6.10 to allow the logo of Sira Naturals on promotional items and materials.

Response:

The Cannabis Control Commission does allow logos on promotional items, as long as they do not include images of marijuana, as described in 935 CMR 501.105 (4) (a)⁷ 1.

(4) Advertising Requirements.

(a) Permitted Practices.

1. A Marijuana Establishment may develop a Brand Name to be used in labeling, signage, and other materials; provided however, that use of medical symbols, images of Marijuana or Marijuana Products, or related Paraphernalia, images that are appealing to persons younger than 21 years old, and colloquial references to Marijuana and Cannabis are prohibited from use in the Brand Name.

Recommendation:

Public Health staff recommends that section 20.6.10 be amended to allow use of logos on promotional items and materials to reflect the Cannabis Control Commission's policy.

3. Request:

Sira Naturals requested that the Board of Health change its policy of requiring approval of edible packaging before allowing sales. Their argument is that the Cannabis Control Commission already controls packaging and labeling and that it is onerous for Sira Naturals to go through the process again.

Response:

After reviewing the website for Sira Natural's Somerville location, Public Health staff discovered that the Cannabis Control Commission appears to have laxer standards regarding packaging. Although the statute specifically disallows packaging that may be attractive to minors, it is interesting to compare package design in the two Sira Natural locations. The Somerville item has bubble letters while the Needham package is much more sedate.

Needham also requires that "MEDICAL MARIJUANA" appears prominently on edible packages. Again, note the comparison between Somerville and Needham packaging.

An interesting sidenote is that other medical marijuana dispensaries (and recreational marijuana stores) run by other companies have even plainer packaging. The third image is from a recreational store in Framingham.

⁷ See link at the end of this memo.

This product was tested for contaminants and there were no adverse findings. The product has been evaluated for environmental contamination (impurities) assuming that no more than 10g (0.35 ounces) of finished plant material (or the equivalent amount of concentrate) will be consumed per day. The impairment effects of edible products may be delayed by two hours or more. This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Nurses on duty during morning and evening feeding times are prohibited from using it. It is not safe to let a child or pet operate machinery when under the influence of the product. **KEEP THIS PRODUCT AWAY FROM CHILDREN.** This product has been evaluated for impurities and contaminants and found to be safe. **DO NOT USE THIS PRODUCT MANUFACTURED IN A FACILITY THAT PROCESSES NUTS AND TREE NUTS.** **Share Point:** **INGREDIENTS:** Short Low Ghee, Net Weight: 1.0g (0.035oz) 100% of Marijuana Extract Processing Type: Ethanol (EHO) 30mg

Medical Marijuana Fruit Bites

Amount Per Serving: **Share Point Packaging:**
30g TNC
100g TNC
300g TNC

Created Date of Active TNC: **Use By:** **Tested On:**

NOT SAFE FOR KIDS **CONTAINING THC** **CERTIFIED LAB TESTED**

Includes Multiple Servings | Sour Blue Raspberry

Nutrition Facts
Servings: 20, Serv. size: 1 Piece (2.65 g)
Amount per serving:
Calories 110, Total Fat 0g, Sodium 0g, Total Carbohydrate 2g, Sugars 2g
Ingredients: Sugar, Glycerin Syrup, Water, Gelatin, Malic Acid, Natural Flavor (Contains FD&C Blue 1, Red 3), Cannabis Oil, Naturally Derived Terpenes
GLUTEN FREE

Made with relaxing **Indica-dominant** terpenes

Produced by: Sire Naturals INC.
MP28303 - 056-421-SRA
info@sirenaturals.com • SireNaturals.org



There is another item sold at Sira Naturals in Somerville that is alarming both for its packaging and for the description on the website. *Mindy's Chef Led Artisanal Edibles in Lush Black Cherry* does not even include the words “cannabis” or “marijuana” on the package, much less “medical marijuana”. The website description of this product is “Like jars of cherries soaked in cabernet and Luxardo with hints of orange and vanilla.

Rich and luscious.” There are other items for sale in Somerville that are even more alarming (black cherry soda and a strawberry crunch bar).



Recommendation: Public Health Department staff recommend that the Needham Board of Health continue the practice of pre-approving all packaging for edibles sold at Sira Naturals.

4. Request:

Sira Naturals also asks that the Board of Health discontinue the requirement to submit CORI reports now that the Cannabis Control Commission has that requirement.

Response:

The Needham regulation is redundant to the state regulation which is clear and comprehensive and could suffice.

Recommendation:

As the requirement for CORI and SORI reports is redundant to the state regulation, the Needham Board of Health can eliminate this requirement. It should, however, be replaced with a statement that Siri is expected to produce their CORI and SORI documentation upon request from the Board or its agent.

Part 3: Other issues

While not addressed in Sira Natural's letter or appearance before the Board of Health, there are at least two other issues the Board might choose to address.

1. Posted prices:

Needham allows a medical marijuana dispensary to provide a list of prices only upon request from the customer. The state, however, permits dispensaries to post their prices.

Page 71; 501.105 (4) (a) 5.: The MTC may post prices in the store and may respond to questions about pricing. The MTC shall provide a catalogue or a printed list of the prices and strains of Marijuana available at the MTC to Registered Qualifying Patients and may post the same catalogue or printed list on its website and in the retail store.

Response:

The benefit to prohibit posting prices is not apparent.

Recommendation:

Public Health staff recommends allowing posting of prices.

2. Packaging of non-edible products:

While the Needham Board of Health requests reviewing packaging of edible marijuana products, it does not similarly review non-edibles as the state does. The Cannabis Control Commission supposedly prohibits packaging "Featuring a design, brand or name that resembles a non-Cannabis consumer product of the type that is typically marketed to minors." ⁸

Response:

There are concerning issues regarding some non-edible packaging, both in Needham and in Somerville. Needham Sira Naturals sells a product called "TrailStix", image below, which appears to be a take on trail mix. "Medical Marijuana" does not appear to be on the packaging.

Although the Cannabis Control Commission prohibits names that mimic common products, especially those marketed to children, the description of the product does just that. *"Dosido #22 is an indica-dominant hybrid strain created through uniting OGKB with a Face/Off OG varietal. Inspired by the popular cookie, this strain also takes its*

⁸ See link to the state regulation.

inspiration from mint chocolate chip ice cream which is noted in the flavor-profile. Dodiso #22 flower presents conical olive green buds and a fragrant resin that coats each trichome.”



There are also topical products, such as body balm and salve stick, that are not clearly labeled as medical marijuana.



Recommendation:

The Board of Health should consider making similar package requirements for non-edibles as it does for edibles.

References:

[Medical Use of Marijuana](#) (935 CMR 501 Operational Requirements for Registered Marijuana Dispensaries)

[Needham Board of Health Registered Marijuana Dispensaries regulation](#)

[Sira Naturals website](#)

[Framingham Garden Remedies website](#)



**Board of Health
TOWN OF NEEDHAM
AGENDA FACT SHEET**



MEETING DATE: 1/20/2021

Agenda Item	Hungry Coyote Restaurant Compliance Issues
Presenter(s)	Diana Acosta

1.	BRIEF DESCRIPTION OF TOPIC TO BE DISCUSSED
Following the Board of Health Meeting on January 5, 2022, Hungry Coyote continued to stay open in defiance of the Suspension Order until Saturday, January 8, 2022. On Wednesday, January 5, 2022 an additional sign yellow sign was added to highlight the establishment was closed. Various members of the Public Health Division and Board of Health documented customers walking in and out of the establishment despite the order and later additional signage being posted on the door. The restaurant reportedly closed on Sunday January 9, 2022 and remained closed until Wednesday January 12, 2022. On Thursday January 13, 2022 a Limited Food Establishment Permit was issued. It expires on July 31, 2022.	
2.	VOTE REQUIRED BY SELECT BOARD
No vote required.	
3.	BACK UP INFORMATION ATTACHED
- Report on Evidence of remaining open - The Final Reinspection Report - Limited 2022 Food Establishment Permit	



Needham Public Health Division

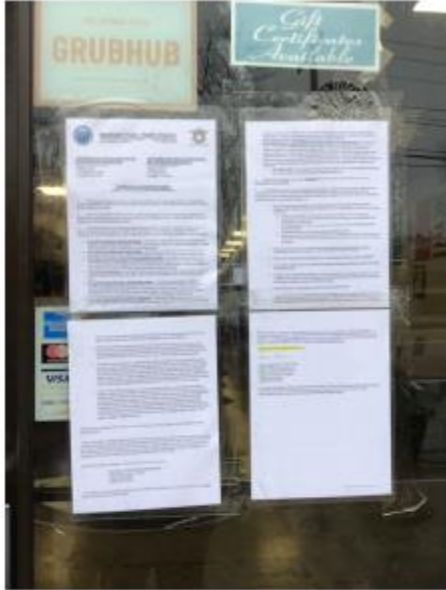
178 Rosemary St., Needham, MA 02494
www.needhamma.gov/health

781-455-7940 ext. 504
781-455-7922 (fax)



RE: Violations of SUMMARY SUSPENSION ORDER - M.G.L. c.111, §30 and 105 CMR 590.014(A)

- January 1, 2022, part-time Environmental Health Agent Monica Pancare witnessed the establishment being open to customers





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- January 3, 2022 at between 1:55pm and 2:00pm, Diana Acosta, Environmental Health Agent witnessed 4 customers entering and exiting the establishment.



Photo of customer exiting Hungry Coyote. Taken on January 3, 2022 at 1:58 pm by Diana Acosta, Environmental Health Agent.

- January 4, 2022 – Board of Health member, Christina Mathews, sent over a picture of the store open



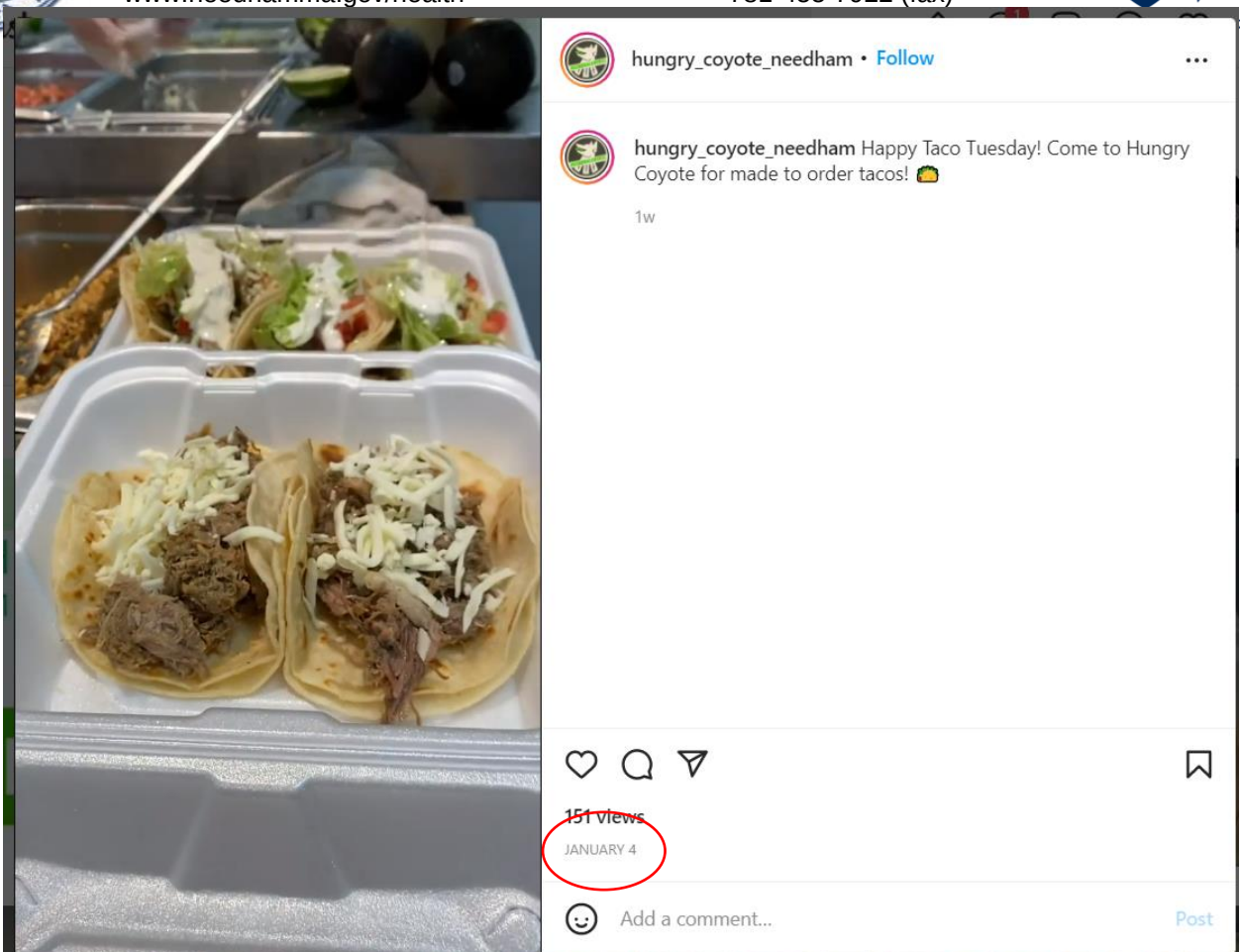
Additionally, Hungry Coyote posted a video on Instagram of a staff member preparing tacos with the caption “Happy Taco Tuesday! Come to Hungry Coyote for made to order tacos!”



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- January 5, 2022 – At 11:35 am Diana was accompanied by Officer Eddie Bayiates. She posted a yellow sign stating the establishment was to cease and desist operations. While posting signage, the manager and staff member were preparing food and remained open to the public. Board of Health meeting was held this night where manager reported remaining open and had no intention of closing the establishment.



R-9

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:t.

FOOD SAFETY INSPECTION REPORT

Page Number

2

Hungry Coyote
1185 Highland Ave
Needham, MA 02492

Inspection Number
15EB8

Date
1/5/22

Time In/Out
11:35 AM
11:43 AM

Inspector
D.Acosta

Inspection Report (continued)

Repeat Violations Highlighted in Yellow

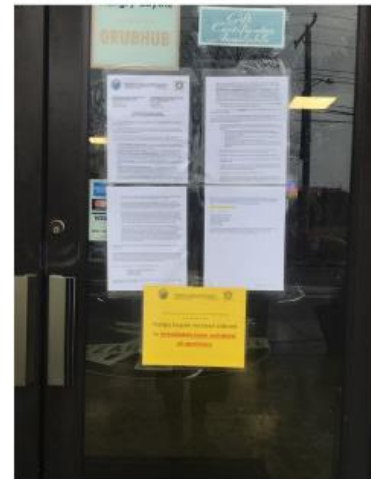
Notes

Notes

88

Notes - Outside -

- N Posted new signage indicating establishment was to cease and desist operations underneath Suspension Order - General Notes.



- January 6, 2022 – Jane L. reported witnessing people going in and out of the establishment. At 3:19 pm, Diana witnessed two young males entering the establishment. One was the son of the manager and the other may have been a friend. Around 5:20 pm, Diana witnessed a table of teenagers eating in the establishment. Tara took a photo at 4:53 of the establishment open.



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781-455-7940 ext. 504
781-455-7922 (fax)



- January 7, 2022- Diana called at 4:34 pm and asked what time the establishment was open until. The person who answered stated 9pm.
- January 8, 2022 – Monica Pancare witnessed customers entering and exiting the establishment



Needham Public Health Division

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www.needhamma.gov/health

781-455-7940 ext. 504
781-455-7922 (fax)



- January 9, 2022 -Karen Shannon sent in photos. Reported seeing two young men walk in. It appeared that the chairs were flipped up on the table. The lights were on as well as the TV. Unclear if business was selling food. Front door was not locked.



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781-455-7940 ext. 504
781-455-7922 (fax)



- January 10, 2022 – Establishment reportedly closed. Diana called and person who answered said they were doing a deep cleaning and closed for the day.
- January 11, 2022 – Zoom call conducted with manager of Hungry Coyote, Diana, Tara, Tim, and Town Counsel. Reported being closed.
- January 12, 2022 -Final Reinspection conducted by Diana and accompanied by Tara and Officer Adrienne Anderson. Establishment was closed.
- January 13, 2022 – Limited permit issued with expiration of 7/31/2022. Signage taken off door. Allowed to resume operation.



FOOD ESTABLISHMENT INSPECTION REPORT

R-10

Hungry Coyote
1185 Highland Ave
Needham, MA 02492

<u>Inspection Number</u>	<u>Date</u>	<u>Time In/Out</u>	<u>Inspection Type</u>	<u>Client Type</u>	<u>Inspector</u>			
11C89	1/12/22	11:03 AM 12:27 PM	Routine	Restaurant	D.Acosta			
<u>Permit Number</u>	<u>Risk</u>	<u>Variance</u>	<u>Violation Summary:</u>		<u>Priority</u>	<u>Pf</u>	<u>Core</u>	<u>Repeat</u>
					1	2	2	

Violation Summary:

Foodborne Illness Risk Factors and Public Health Interventions

IN = in compliance OUT = out of compliance N/O = not observed N/A = not applicable COS = corrected on-site during inspection Repeat Violations Highlighted in Yellow

Supervision	IN	OUT	NA	NO	COS	Protection from Contamination (Cont'd)	IN	OUT	NA	NO	COS
1. PIC present, demonstrates knowledge, and performs duties	☒	☐	☐	☐	☐	15. Food separated and protected	1	☒	☐	☐	☒
2. Certified Food Protection Manager	☒	☐	☐	☐	☐	16. Food-contact surfaces; cleaned & sanitized	☒	☐	☐	☐	☐
Employee Health	IN	OUT	NA	NO	COS	17. Proper disposition of returned, previously served,	☒	☐	☐	☐	☐
3. Management, food employee and conditional employee knowledge, responsibilities and reporting	☒	☐	☐	☐	☐	Time/Temperature Control for Safety	IN	OUT	NA	NO	COS
4. Proper use of restriction and exclusion	☒	☐	☐	☐	☐	18. Proper cooking time & temperatures	☒	☐	☐	☐	☐
5. Procedures for responding to vomiting and diarrheal events	☒	☐	☐	☐	☐	19. Proper reheating procedures for hot holding	☒	☐	☐	☐	☐
Good Hygienic Practices	IN	OUT	NA	NO	COS	20. Proper cooling time and temperature	☒	☐	☐	☐	☐
6. Proper eating, tasting, drinking, or tobacco use	☒	☐	☐	☐	☐	21. Proper hot holding temperatures	☒	☐	☐	☐	☐
7. No discharge from eyes, nose, and mouth	☒	☐	☐	☐	☐	22. Proper cold holding temperatures	☒	☐	☐	☐	☐
Preventing Contamination by Hands	IN	OUT	NA	NO	COS	23. Proper date marking and disposition	1	☒	☐	☐	☒
8. Hands clean & properly washed	☒	☐	☐	☐	☐	24. Time as a Public Health Control; procedures & records	☒	☐	☐	☐	☐
9. No bare hand contact with RTE food or a pre-approved	☒	☐	☐	☐	☐	Consumer Advisory	IN	OUT	NA	NO	COS
10. Adequate handwashing sinks supplied and accessible	☒	☐	☐	☐	☐	25. Consumer advisory provided for raw/undercooked food	☒	☐	☐	☐	☐
Approved Source	IN	OUT	NA	NO	COS	Highly Susceptible Populations	IN	OUT	NA	NO	COS
11. Food obtained from approved source	☒	☐	☐	☐	☐	26. Pasteurized foods used; prohibited foods not offered	☒	☐	☐	☐	☐
12. Food received at proper temperature	☒	☐	☐	☐	☐	Food/Color Additives and Toxic Substances	IN	OUT	NA	NO	COS
13. Food in good condition, safe & unadulterated	☒	☐	☐	☐	☐	27. Food additives: approved & properly used	☒	☐	☐	☐	☐
14. Required records available: shellstock tags, parasite	☒	☐	☐	☐	☐	28. Toxic substances properly identified, stored & used	☒	☐	☐	☐	☐
						Conformance with Approved Procedures	IN	OUT	NA	NO	COS
						29. Compliance with variance/specialized process/HACCP	☒	☐	☐	☐	☐

Repeat Violations Highlighted in Yellow

Good Retail Practices

Safe Food and Water	IN	OUT	NA	NO	COS	Proper Use of Utensils	IN	OUT	NA	NO	COS
30. Pasteurized eggs used where required	☒	☐	☐	☐	☐	43. In-use utensils: properly stored	☐	☐	☐	☐	☐
31. Water & ice from approved source	☐	☐	☐	☐	☐	44. Utensils, equip. & linens: properly stored, dried & handled	☐	☐	☐	☐	☐
32. Variance obtained for specialized processing methods	☒	☐	☐	☐	☐	45. Single-use/single-service articles: properly stored & used	☐	☐	☐	☐	☐
Food Temperature Control	IN	OUT	NA	NO	COS	46. Gloves used properly	☐	☐	☐	☐	☐
33. Proper cooling methods used; adequate equip. for temp.	☒	☐	☐	☐	☐	Utensils, Equipment and Vending	IN	OUT	NA	NO	COS
34. Plant food properly cooked for hot holding	☐	☐	☐	☐	☐	47. All contact surfaces cleanable, properly designed,	☐	☐	☐	☐	☐
35. Approved thawing methods used	☐	☐	☐	☐	☐	48. Warewashing facilities: installed, maintained & used; test	☐	☐	☐	☐	☐
36. Thermometers provided & accurate	1	☒	☐	☒	☐	49. Non-food contact surfaces clean	☐	☐	☐	☐	☐
Food Identification	IN	OUT	NA	NO	COS	Physical Facilities	IN	OUT	NA	NO	COS
37. Food properly labeled; original container	1	☒	☐	☒	☐	50. Hot & cold water available; adequate pressure	☐	☐	☐	☐	☐
Prevention of Food Contamination	IN	OUT	NA	NO	COS	51. Plumbing installed; proper backflow devices	1	☒	☐	☐	☐
38. Insects, rodents & animals not present	☐	☐	☐	☐	☐	52. Sewage & waste water properly disposed	☐	☐	☐	☐	☐
39. Contamination prevented in prep, storage & display	☐	☐	☐	☐	☐	53. Toilet facilities: properly constructed, supplied, & cleaned	☐	☐	☐	☐	☐
40. Personal cleanliness	☐	☐	☐	☐	☐	54. Garbage & refuse properly disposed; facilities maintained	☐	☐	☐	☐	☐
41. Wiping cloths; properly used & stored	☐	☐	☐	☐	☐	55. Physical facilities installed, maintained & clean	☐	☐	☐	☐	☐
42. Washing fruits & vegetables	☐	☐	☐	☐	☐	56. Adequate ventilation & lighting; designated areas use	☐	☐	☐	☐	☐
						60. 105 CMR 590 violations / local regulations	☒	☐	☐	☐	☐

Official Order for Correction: Based on an inspection today, the items marked "OUT" indicated violations of 105 CMR 590.000 and applicable sections of the 2013 FDA Food Code. This report, when signed below by a Board of Health member or its agent constitutes an order of the Board of Health. Failure to correct violations cited in this report may result in suspension or revocation of the food establishment permit and cessation of food establishment operations. If you are subject to a notice of suspension, revocation, or non-renewal

D. Acosta

D.Acosta

Francisco

Francisco - Expires
Certificate #:

Follow Up Required: ☐ Y Follow Up Date: _____

FOOD SAFETY INSPECTION REPORT

Page Number

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Hungry Coyote
1185 Highland Ave
Needham, MA 02492

Inspection Number
11C89

Date
1/12/22

Time In/Out
11:03 AM
12:27 PM

Inspector
D.Acosta

Inspection Report (Continued)

Repeat Violations Highlighted in Yellow

Protection From Contamination

Food Separated and protected

15 3-302.11 (A)(2) Raw Animal Foods Separated from each other - Kitchen -

- COS** **Pr** Raw eggs and raw bacon found on top shelves of walk in cooler. Moved to lower shelves. Code: *Foods shall be protected from cross contamination by: Except when combined as ingredients, separating types of raw animal foods from each other such as beef, fish, lamb, pork and poultry during storage, preparation, holding, and display by: (a) Using separate equipment for each type, or (b) Arranging each type of food in equipment so that cross contamination of one type with another is prevented and (c) preparing each type of food at different times or in separate areas.*



Time / Temperature Control for Safety

Date marking and disposition

23 3-501.17 (A)(C) Date Marking RTE Foods - On Premises Prep - Kitchen -

- COS** **Pf** Chile rellenos found from 1/4/22. Past 7 day mark. Voluntarily discarded. Code: *Refrigerated, RTE/TCS food prepared and held refrigerated for more than 24 hours in a food establishment shall be clearly marked at the time of preparation to indicate the date by which the food shall be consumed, sold or discarded when held at a temperature of 41°F or less for a maximum of 7 days. The day of preparation shall be counted as Day 1. A refrigerated, RTE/TCS food ingredient or a portion of a refrigerated, RTE/TCS food that is subsequently combined with additional ingredients or portions of food shall retain the date marking of the earliest-prepared or first-prepared ingredient.*

Food Temperature Control

FOOD SAFETY INSPECTION REPORT

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Hungry Coyote
1185 Highland Ave
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11C89

Date
1/12/22

Time In/Out
11:03 AM
12:27 PM

Inspector
D.Acosta

Inspection Report (Continued)

Repeat Violations Highlighted in Yellow

Thermometers provided & accurate

36 4-502.11 (B) Good Repair and Calibration - Kitchen -

COS Pf Stem type thermometers were reading 40°F in ice water. Brought a wrench to calibrate. Adjusted thermometers to proper temp. *Code: Food temperature measuring devices shall be calibrated in accordance with manufacturer's specifications as necessary to ensure their accuracy.*



Food Identification

FOOD SAFETY INSPECTION REPORT

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Hungry Coyote
1185 Highland Ave
Needham, MA 02492

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11C89

Date
1/12/22

Time In/Out
11:03 AM
12:27 PM

Inspector
D.Acosta

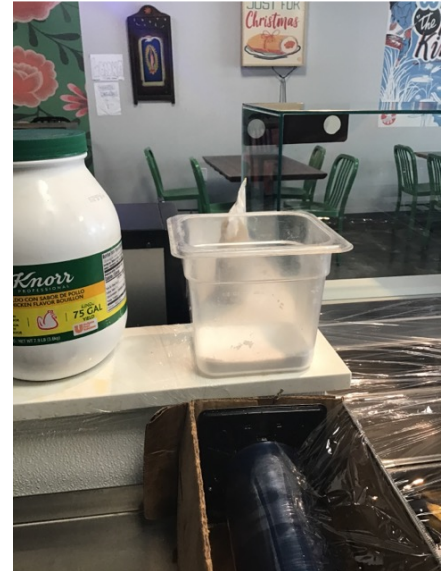
Inspection Report (Continued)

Repeat Violations Highlighted in Yellow

Food properly labeled; original container

37 3-302.12 Food Storage Containers Identified/Common Name - Kitchen -

- COS** **C** Container of salt, unlabeled. Voluntarily discarded Code:
Except for containers holding food that can be readily and unmistakably recognized such as dry pasta, working containers holding food or food ingredients that are removed from their original packages for use in the food establishment, such as cooking oils, flour, herbs, potato flakes, salt, spices, and sugar shall be identified with the common name of the food.



Physical Facilities

FOOD SAFETY INSPECTION REPORT

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Hungry Coyote
1185 Highland Ave
Needham, MA 02492

Inspection Number
11C89

Date
1/12/22

Time In/Out
11:03 AM
12:27 PM

Inspector
D.Acosta

Inspection Report (Continued)

Repeat Violations Highlighted in Yellow

Plumbing installed; proper backflow devices

51 5-205.15 (B) System Maintained/Repair - Kitchen -

- C Hot water tank has hose leaking or to floor. Area was mopped. *Code: A plumbing system shall be maintained in good repair.*



Notes

FOOD SAFETY INSPECTION REPORT

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Hungry Coyote
1185 Highland Ave
Needham, MA 02492

Inspection Number
11C89

Date
1/12/22

Time In/Out
11:03 AM
12:27 PM

Inspector
D.Acosta

Inspection Report (Continued)

Repeat Violations Highlighted in Yellow

Notes

88

Notes - Front of House -

N Door added - General Notes.



88

Notes - Kitchen -

N No much food onsite. - General Notes.



FOOD SAFETY INSPECTION REPORT

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11C89

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Time In/Out
11:03 AM
12:27 PM

Inspector
D.Acosta

Inspection Report (Continued)

Repeat Violations Highlighted in Yellow

88 Notes - Kitchen -

N Gasket in good repair. - General Notes.



88 Notes - Kitchen -

N Ice wands were purchased. - General Notes.



FOOD SAFETY INSPECTION REPORT

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Time In/Out
11:03 AM
12:27 PM

Inspector
D.Acosta

Inspection Report (Continued)

Repeat Violations Highlighted in Yellow

88 Notes - Kitchen -

- N** Large container of raw chorizo had a sticker where date was not clear. Appeared to say 1.2.22 but staff reported it was prepared this past weekend. Unclear of what day it was prepared - voluntarily discarded. - General Notes.

88 Notes - Kitchen -

- N** Bulk items labeled. - General Notes.



FOOD SAFETY INSPECTION REPORT

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11:03 AM
12:27 PM

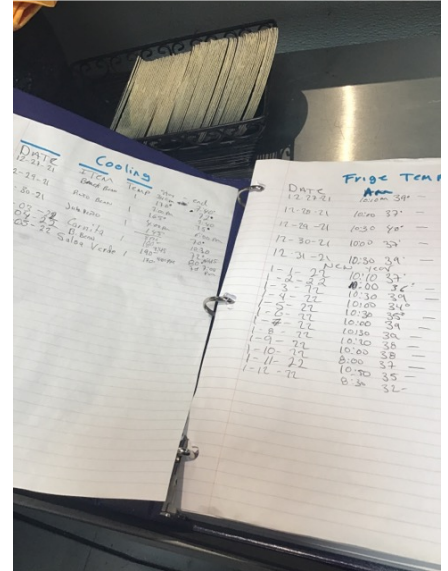
Inspector
D.Acosta

Inspection Report (Continued)

Repeat Violations Highlighted in Yellow

88 Notes - Kitchen -

N Temperature / cooling log. - General Notes.



88 Notes - Outside -

N Cardboard dumpster full. Reportedly being taken out tomorrow. Recycling Dumpster are picked up weekly. Dumpster for trash is bi weekly. - General Notes.



Positive Notes

FOOD SAFETY INSPECTION REPORT

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Inspector
D.Acosta

Inspection Report (Continued)

Repeat Violations Highlighted in Yellow

Proper Food Safety Practices

98 98 Proper Food Safety Practices - Kitchen -

- N** Proper storage. Fridge shelves are labeled with what items go on shelf. Chicken on bottom, red meat, RTE on top shelf - Excellent.



List 1

IN= In Compliance

OUT = Out of Compliance

NA = Not Applicable

NO= Not Observed

Permit. up to date and posted?

NA

Pest control record available?

NO

Written Menus /signs present (allergen)?

IN

Allergen Certificate Posted?

IN

Certified Food Protection Managers Certificate posted?

IN

Food allergy awareness poster visible for employees?

IN

Staff trained in choke-save for every shift.

IN

Ventilation Hood Inspections stickers up to date?

IN

Consumer Advisory Present if needed?

IN

Grease log up to date?

NO

Food Employee Reporting Agreement available?

NO

Procedures outlines for vomit/diarreal event?

IN

FOOD SAFETY INSPECTION REPORT

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Hungry Coyote
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Inspector
D.Acosta

Inspection Report (Continued)

Repeat Violations Highlighted in Yellow



No trans fat?

IN



"Most recent food inspection" sign posted?

IN

Temperatures

Area	Equipment	Product	Notes	Temps
Front of House	Burrito station right	Cut bell peppers		39 °F
Front of House	Burrito station right	Cut onions		39 °F
Front of House	Burrito station right	Ambient		40 °F
Front of House	Burrito station right	Cut onions in cold well		39.5 °F
Front of House	Burrito station left	Raw bacon in cold well		41 °F
Front of House	Burrito station left	Churro sticks		41.5 °F
Kitchen	Asber reach in cooler	Raw beef		41 °F
Kitchen	Asber reach in cooler	Raw chicken		40 °F
Kitchen	Asber reach in	Ambient		7 °F
Kitchen	Walk in beer cooler	Ambient		38 °F
Kitchen	Walk in beer cooler	Chorizo raw		38 °F
Kitchen	Walk in beer cooler	Raw chicken		38 °F
Kitchen	Walk in beer cooler	Cooked pork		37 °F

Temperatures in **RED** identify items in the temperature danger zone. See the report notes for specific details.

Notes

Final reinspection to determine whether or not permit to be issued for 2022. Accompanied by Tara G. and Adrienne A.

FOOD SAFETY INSPECTION REPORT

Page Number

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Hungry Coyote
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Inspector
D.Acosta

Inspection Report (Continued)

Repeat Violations Highlighted in Yellow

3 cpr certs submitted yesterday. 2 allergen training certificates were submitted.

No date marking observed on items in cold well of burrito station. All items voluntarily discarded.

Trash bins were not next to handwashing sink. Added during inspection.

Dishwasher is not being used behind the bar. Need to add a sign that it is not in use.

Need to keep a grease trap log. Pest control needs to be submitted.

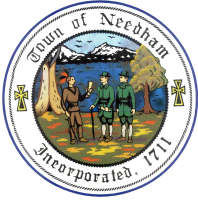
Need to properly secure hot water tank condensate pipe to floor drain ASAP.

Will assess need with food consultant need to add an additional 2 door refrigeration unit.

Need to add dumpster area, Bar area and floor drain cleanings and hood exhaust filter cleanings to cleaning logs.

Need to submit cleaning, sanitizer, and temperature logs weekly as agreed

Grease Trap logs must be submitted to Health Division monthly



**Town of Needham
Public Health Division**

178 Rosemary Street
Needham, MA 02494

www.needhamma.gov/health

Phone: [781-455-7940](tel:781-455-7940) ext. 504

Fax: [781-455-7922](tel:781-455-7922)



**THE COMMONWEALTH OF MASSACHUSETTS
Town of Needham, Board of Health**

Permit No. FOOD-10268

Issue Date: January 13, 2022

Expires: July 31, 2022

2022 Food Establishment Permit

In accordance with 105 CMR (Article X of the State Sanitary Code), a permit to operate a retail / food establishment is hereby granted to:

Establishment: Hungry Coyote
Person Onsite: Francisco Mendez
Address: 1185 Highland Ave
Phone: [781-292-1004](tel:781-292-1004)

Type of License: Food Establishment Permit

Renewal

NON-TRANSFERABLE

POST CONSPICUOUSLY

Diana C. Acosta, REHS/RS, MPH
Environmental Health Agent

This is an e-permit. To learn more, scan this barcode or visit needhamma.viewpointcloud.com/#/records/16315





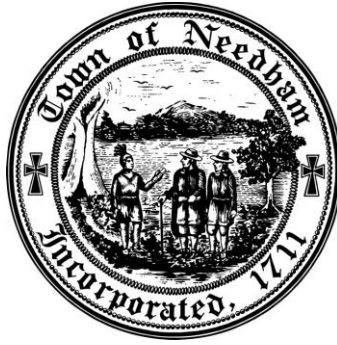
**Board of Health
TOWN OF NEEDHAM
AGENDA FACT SHEET**



MEETING DATE: 1/20/2022

Agenda Item	#1688 Central Avenue and Licensed Site Professional Scope of Work
Presenter	Timothy McDonald, Director of Health & Human Services Tara Gurge, Assistant Public Health Director

1.	BRIEF DESCRIPTION OF TOPIC TO BE DISCUSSED
Mr. McDonald and Ms. Gurge will discuss the 1688 Central Avenue development and the scope of work, drafted at the Board's request, to retain an outside expert to assess the development plans and associated environmental remediation activities. If the Board agrees with the Scope of Work as outlined, the Town will follow all applicable state procurement laws and Town policies and will engage a vendor to accomplish the Scope of Work.	
2.	VOTE REQUIRED BY BOARD OF HEALTH
No vote is required.	
3.	BACK UP INFORMATION ATTACHED:
Draft Scope of Work for Licensed Site Professional.	



Scope of Services

Name/Title: Licensed Site Professional Plan Review for the Needham Board of Health

Timeline of Work: February 15, 2022 to May 15, 2022

Contract Number: TBD

Scope of Services

The Town of Needham's Public Health Division, acting on behalf of the Needham Board of Health, will retain an expert (a Licensed Site Professional who has a current and valid license from the Board of Registration of Hazardous Waste Site Cleanup Professionals) to review and assess proposed development and environmental remediation plans for the property at #1688 Central Avenue, Needham, MA 02492.

The Licensed Site Professional (LSP) may, if authorized, assess the physical location of the property and may review test results for soil testing at the property, if provided. He/she/they will prepare a full written assessment report, a brief executive summary document with recommendations, and at least two presentations/slide decks outlining the LSP's work process and recommendations.

Deliverables & Project Activities

- Complete review of existing documentation in Town and state records, as well as any materials provided by the applicant proposing development of the property at #1688 Central Avenue;
- If authorized, conduct a physical site review at the property location;
- Develop and produce a comprehensive written report on the proposed development, any associated environmental remediation currently planned, and the LSP's assessment of the sufficiency or lack thereof of the proposed remediation activities;

- Develop and produce an executive summary document of the above report with recommendations for the Board of Health's consideration;
- Develop and produce at least two presentations/slide decks, one of which shall outline the LSP's proposed work process and the other of which will detail his/her/their final report and recommendations; and
- Using the slide decks and other written material note above, present at Board of Health meetings about this project. Please note that all Board of Health meetings are open to the public.

Invoicing

The consultant shall submit at least two invoices with a detailed accounting of expenditures, receipts, and a *brief narrative accompaniment (approximately one to two paragraphs in length) specific to the activities conducted during the period for which reimbursement is requested.* The invoice and brief narrative shall be submitted by March 15, 2022, April 15, 2022, and, if needed, by May 15, 2022. It is anticipated that the work on this project will take no more than 60 days from contract start, although 90 days are included in the contract period as a safeguard against possible delays.

Invoicing shall be processed for payment immediately following receipt, review, and approval of all expenses documented. Payments may not exceed the total Agreement amount, including reimbursable expenses. Payments may not be made in advance. Payments are subject to appropriation.

With any invoice, the consultant shall submit evidence satisfactory to the Town that the work has been completed and that all payrolls, material bills and other indebtedness connected with the work has been paid.

Acceptance by the consultant of any payment or partial payment, without any written objection by the consultant, shall in each instance operate as a release and discharge of the Town from all claims, liabilities or other obligations relating to the performance of a Contract.

If for any reason the Town makes a payment under this Agreement in error, the Town may recover the amount overpaid or, if applicable, may apply any overpayment to a future installment payment.

Invoicing submitted by the consultant shall include:

1. A cover letter (or invoice top sheet) on letterhead that includes, among other things...
 - the purchase order or contract number,
 - the billing period (monthly),
 - the Needham Point of Contact (Assistant PH Director Tara Gurge),

- the point of contact for the consultant or consulting organization,
 - the signature of the official authorizing the invoice and attesting to its validity.
2. An invoice top sheet/summary that details costs by budget area (where appropriate).
 - Personnel Costs
 - Non-Personnel Costs, including equipment, supplies, and contracted services
 - Other Expenses, including travel and ancillary expenses
 3. A breakdown table or chart for each of the budget areas above (for example, instead of saying Salaries = \$X, it would say Jane Jones = \$X, Seth Smith = \$Y, etc.)

Price Quote

Submission Due: January 31, 2022 by 1:00 p.m. to
healthdepartment@needhamma.gov

Timeline of Work: February 15, 2022 to May 15, 2022

I, _____, acting as the authorized representative of _____, do confirm that my organization will complete all aspects of the Scope of Work and will conduct the *Licensed Site Professional Plan Review for Needham Board of Health* project for the Town of Needham. I/my organization shall adhere to the reporting and invoicing requirements outlined above, and will complete all of the work in a timely manner for a price not to exceed _____.

Required Documents to be included with Price Quote Submission

- Brief Budget Narrative
- Monthly Budget Spreadsheet
- Workplan & Timeline
- Statement of Qualifications, including resume(s)
- List of no fewer than three references (including contact information) with which the consulting company or individual consultant has conducted business



**Board of Health
TOWN OF NEEDHAM
AGENDA FACT SHEET**



MEETING DATE: 1/20/2022

Agenda Item	Brewery Concept
Presenter	Amy Haelsen, Economic Development Manager

1.	BRIEF DESCRIPTION OF TOPIC TO BE DISCUSSED
Amy Haelsen, Needham's Economic Development Manager, will meet with the Board of Health and discuss an item – potentially amending zoning to allow for a brewery and tap room in Needham – that is under consideration by the Planning Board and <u>may</u> be the subject of a Warrant Article at a future Town Meeting.	
2.	VOTE REQUIRED BY BOARD OF HEALTH
Vote not required.	
3.	BACK UP INFORMATION ATTACHED:
None. Discussion only.	



**Board of Health
TOWN OF NEEDHAM
AGENDA FACT SHEET**



MEETING DATE: 1/20/2022

Agenda Item	Alcohol Compliance
Presenter	Karen Shannon/Prevention Team

1.	BRIEF DESCRIPTION OF TOPIC TO BE DISCUSSED
Alcohol compliance checks were conducted on December 1, 2021 by the Needham Police Department under the supervision of Sgt. John McGrath. Of the 31 Needham establishments holding alcohol licenses, 25 were checked and 11 license holders had sales to minor violations. Training and Intervention Procedures for Servers (TIPS) was conducted on January 10, 2022. Thirty (30) Needham license holders registered for the 5-hour, in-person training and 20 attended. Six (6) establishments of the 11 businesses with sales violations attended the training. Carol Read and Sgt. Jason Sullivan of the Dedham Police Department conducted the training at Needham Town Hall. More detailed breakdown of this information described in Alcohol Compliance Summary.	
2.	VOTE REQUIRED BY BOARD OF HEALTH
Vote not required.	
3.	BACK UP INFORMATION ATTACHED:
Alcohol Compliance Summary created by Public Health Division Prevention Team.	



NEEDHAM PUBLIC HEALTH



Summary of Alcohol Compliance Checks & TIPS Training- 2021-2022

Needham Establishment	December 1 st , 2021 Compliance Checks	January 10 th , 2022 TIPS Training
1. Bertucci's	Pass	
2. Bin Ends	Failure	6 attended
3. Blue on Highland	Pass	
4. Cappella	Failure	1 no show
5. Cook Needham	Failure	4 attended, 3 cancellations
6. French Press Bakery	Not open	
7. Fuji Steak House	Failure	1 attended
8. Gari	Pass	
9. Hearth Pizzeria	Failure	2 attended
10. Hungry Coyote	Failure	1 attended
11. Latina Kitchen and Bar	Pass	
12. Mandarin Cuisine	Pass	
13. Masala Art	Pass	
14. Needham Fine Wines	Pass	3 no shows
15. Needham Golf Club	Not open	
16. Needham Wine & Spirits	Pass	
17. Ray's New Garden	Failure	
18. Pancho's Taqueria	Failure	
19. Residence Inn	Failure	
20. Reveler Beverage	Pass	
21. Rice Barn	Failure	2 attended
22. Sheraton Needham	Not open	
23. Spiga	Pass	
24. The Farmhouse	Pass	
25. Homewood Suites	Not open	
26. The James	Failure	2 cancelled
27. The Needham General Store	Pass	
28. V.F.W.	Not accessible	2 attended
29. Village Club	Not accessible	1 attended
30. Vinodivino	Pass	
31. Volante Farms	Pass	1 attended, 1 cancellation

Total Registered from Needham: 30

Total Attended from Needham: 20

Total Registered from Elsewhere: 2

Total Attended from Elsewhere: 1

Businesses who **failed** compliance checks and **did not** attend TIPS:

- Capella (One registration, but missed the training)
- Ray's New Garden
- Pancho's Taqueria
- Residence Inn
- The James (Two registered but were unable to attend due to Covid- 19 related exposure)



**Board of Health
TOWN OF NEEDHAM
AGENDA FACT SHEET**



MEETING DATE: 1/20/2022

Agenda Item	Synthetic Field Turf Testing & Results
Presenter	Tara Gurge, Assistant Public Health Director

1.	BRIEF DESCRIPTION OF TOPIC TO BE DISCUSSED
Discuss recent testing results for crumb rubber grab samples that were taken from three turf fields – 2 turf fields at DeFazio Park and 1 turf field at Memorial Park.	
2.	VOTE REQUIRED BY BOARD OF HEALTH
Vote is not required, nor is one requested.	
3.	BACK UP INFORMATION:
Below is email that was received from Fuss & O'Neill along with copy of enclosed report - From: Wendy Tram <wtram@fando.com> Sent: Friday, December 17, 2021 2:47 PM To: Tara Gurge <TGurge@needhamma.gov> Cc: Daniel LaFrance <DLaFrance@fando.com> Subject: RE: [External] RE: Status of Contract for Needham Crumb Rubber Testing for FY22 - Attached report Tara, Attached is our report for this year's crumb rubber testing. I would like to point out that acetone was the only compound reported above the MassDEP screening value. We don't believe the concentration to be of concern for several reasons. First being that it was an estimated value, so it could be biased high or low (most likely biased high). Acetone is a common laboratory reagent and it can show up as a detection. Acetone was not detected or detected below the screening value in past sampling events. If you have any questions regarding our conclusions, feel free to reach out. Thanks, Wendy Tram Environmental Engineer Fuss & O'Neill, Inc. 108 Myrtle Street, Suite 502 Quincy, MA 02171 617.282.4675 x4725 wtram@fando.com www.fando.com twitter facebook linkedin	

Crumb Rubber Monitoring Results

**Memorial Park & DeFazio Park
Needham, Massachusetts**

Needham Health Department

Needham, Massachusetts

December 2021



FUSS & O'NEILL

Fuss & O'Neill, Inc.
108 Myrtle Street, Suite 502
Quincy, MA 02171



December 17, 2021

Mr. Timothy McDonald
Director of Public Health
Needham Health Department
1471 Highland Avenue
Needham, MA 02492

RE: **Crumb Rubber Monitoring Results – November 2021**
Memorial and DeFazio Parks
Needham, Massachusetts
Fuss & O'Neill Project No. 20081266.B20

Dear Mr. McDonald:

Enclosed is the summary report for crumb rubber testing performed at the artificial turf athletic fields located at Memorial Park and DeFazio Park in Needham, Massachusetts in November 2021.

If you should have any questions regarding the contents of this report, please do not hesitate to contact me at (860) 646-2469 ext. 4538. Thank you for this opportunity to have served your environmental needs.

Sincerely,

Daniel LaFrance, PE, LSP
Project Manager

108 Myrtle Street
Suite 502
Quincy, MA
02171
t 617.282.4675
800.286.2469
f 617.481.5885

wt/dl/bs

Enclosure

www.fando.com

California
Connecticut
Maine
Massachusetts
New Hampshire
Rhode Island
Vermont

\\Private\DFS\ProjectData\P2008\1266\B20\Deliverables\Report\dcl_CrumbRubberSampling_2021_1116.docx

Table of Contents

Crumb Rubber Monitoring Results Memorial Park & DeFazio Park Needham Health Department

1	Introduction and Background	1
2	Methodology and Scope of Testing.....	1
3	Results	2
4	Data Evaluation.....	2
5	Conclusions	3

Tables

End of Report

1. Summary of Crumb Rubber Monitoring Results
2. Real-Time Measurements

Figures

End of Report

1. Site Plan – Memorial Park
2. Site Plan – DeFazio Park

Appendices

End of Report

- APPENDIX A - LABORATORY ANALYTICAL REPORTS & CHAIN-OF-CUSTODY FORMS
APPENDIX B - SAMPLING EQUIPMENT
APPENDIX C - FIELD DATA SHEETS

1 Introduction and Background

Fuss & O'Neill, Inc. (Fuss & O'Neill) was retained by the Needham Health Department to perform periodic monitoring of the crumb rubber used at the artificial turf athletic fields in Needham, Massachusetts. The study involved the collection of field measurements and crumb rubber samples from Memorial Park (Needham High School Field, 92 Rosemary Street) and DeFazio Park (Brock Field and Founders Field, 380 Dedham Avenue) for laboratory analysis. The laboratory data were compared to toxicity reference data from the Massachusetts Department of Environmental Protection (MassDEP) to evaluate potential health-related impacts.

On November 1, 2021, Ms. Wendy Tram of Fuss & O'Neill performed the crumb rubber sampling for the Needham Health Department (the "Client") in accordance with our proposal dated August 17, 2021.

2 Methodology and Scope of Testing

On November 1, 2021, Fuss & O'Neill and Client personnel accessed the three athletic fields to perform the sampling and monitoring activities. A three-point composite sample of crumb rubber was collected from each artificial turf athletic field using a trowel. The composite samples were comprised of crumb rubber collected from the two ends and the middle of each artificial turf athletic field. Diagrams depicting sample locations are included as *Figure 1* (Memorial Park) and *Figure 2* (DeFazio Park). Samples were collected from the Needham High School Field in Memorial Park, and from Founders Field and Brock Field in DeFazio Park.

The composite samples were submitted to EMSL Analytical Laboratory in Cinnaminson, New Jersey (EMSL). The crumb rubber was analyzed for trace metals by Environmental Protection Agency (EPA) Methods 6010/7471 (inductively coupled plasma atomic emission spectrometry [ICP-AES] and mercury by manual cold-vapor technique, respectively); semi-volatile organic compounds (SVOCs) by EPA Method 8270; and volatile organic compounds (VOCs) by EPA Method TO-15. The VOCs were collected from a "closed container" test, with an air headspace over a sample of the crumb rubber heated to 120°F for one hour. A "tentatively identified compound" (TIC) search was performed in connection with the analytical data.

The purpose of the closed container VOC test was to determine what concentrations and types of VOCs could be generated from the crumb rubber in a heated state, e.g. a field with full sun on summer day. Refer to *Appendix A* for the laboratory analytical reports and chain of custody forms. Refer to *Table 1* for a summary of the analytical results.

Real-time ambient conditions were monitored during crumb rubber sampling. VOCs were measured using an Ion Science Tiger Photoionization Detector (PID). A TSI Q-Trak Air Quality Monitor was used to record ambient temperature and relative humidity (RH). Refer to *Appendix B* for a list of sampling equipment, and *Table 2* for real-time measurements.

3 Results

Analytical data are summarized on *Table 1*. Multiple VOCs (including TICs) were identified in each sample. The following VOCs were detected in the gas stream samples:

- Ethanol
- Isopropyl alcohol
- Acetone
- Butanone (methyl ethyl ketone; MEK)
- Methyl isobutyl ketone (MIBK)
- Methylene chloride
- Tertiary butyl alcohol (TBA)

Furthermore, 2-methyl propene and carbonyl sulfide were identified as TICs in the analyses.

Iron, lead, manganese, and zinc were each detected in all three samples, while chromium was detected in the sample collected from Brock Field. Mercury, arsenic, cadmium, and selenium were not detected in any sample.

Three to four SVOCs were identified in each of the rubber samples. The SVOCs were all within the class of “polycyclic aromatic hydrocarbons” (PAHs). While only three to four SVOCs were identified in each sample, *Table 1* includes the EPA-designated “Priority Pollutant” PAHs, which include multiple similar compounds.

VOCs were recorded at concentrations at or below 0.8 parts per million by volume (ppmv) in ambient air. Readings less than 1.0 ppmv may occur as a result of moisture in ambient air. The ambient relative humidity at the time of sampling was between 31.5 and 63.3 percent, within a 58.1- to 66.3-degree Fahrenheit environment.

4 Data Evaluation

The Massachusetts Contingency Plan (MCP; 310 CMR 40.0000) establishes soil standards for a variety of uses based on publicly-available toxicity data for a range of compounds, including VOCs, SVOCs, and metals. The numerical standards and their derivations are publicly-available.¹ MassDEP generally establishes these standards based on four criteria:

- Publicly-available toxicity data, including EPA and MassDEP Office of Research and Standards (ORS) data, and peer-reviewed industry sources.
- Typical background levels in New England soil.
- Ceiling concentrations (i.e. maximum concentrations set for compounds of limited toxicity).
- Practical quantification levels (PQLs), i.e. levels which analytical laboratories can reliably quantify.

¹ MassDEP, December 2017, “MCP Numerical Standards.” <https://www.mass.gov/doc/mcp-numerical-standards-derivation/download>, accessed June 2020.

In its toxicity calculations for S-1 soil (applicable to sensitive land uses, including residences, schools and day-care facilities), MassDEP considers inhalation and skin-absorption risks over exposures from infancy to adulthood. Fuss & O'Neill evaluated the crumb rubber analytical results relative to MassDEP's published toxicity levels (i.e. the levels which would be used in the absence of ceiling, background or PQL considerations). These values are included on *Table 1*. Where MassDEP has not published toxicity values, Fuss & O'Neill consulted the EPA "regional screening levels," (RSLs) which consist of similarly-derived guidance values for a range of compounds used for screening contaminant concentrations on sites evaluated under the Superfund program.² Where RSLs were incorporated into this evaluation, the "non-carcinogenic child screening levels" for resident soil and resident air were generally the most conservative values and were incorporated herein.

With the exceptions of carbonyl sulfide, ethanol, and 2-methyl propene, MassDEP and/or EPA values were available for all detected compounds. The exposure levels assume continuous high-contact exposure (five days per week, 30 weeks per year) over a multiple-year duration and are therefore conservative with regard to the actual exposures for users of the field.

As noted on *Table 1*, acetone was detected in one sample at a concentration greater than the MassDEP screening value, while the remaining concentrations were less than the respective screening levels. The acetone value was reported by the laboratory as an estimated concentration that exceeded the upper calibration value. The estimated value was yielded due to the inability to meet certain laboratory conditions during the time of extraction. The estimated concentration may be biased high. Note that acetone was either not detected or detected below the respective MassDEP screening value during previous years. Acetone is frequently used as a laboratory reagent, and the VOC methodology involved the laboratory handling the sample to perform the headspace extraction. Therefore, the presence of acetone vapors in the sample may be unrelated to the crumb rubber and related to the laboratory conditions.

With the exception of three compounds (arsenic, and PAH compounds dibenz[a,h]anthracene and benzo[a]pyrene) whose laboratory reporting limits exceeded threshold values, the remaining detections for metals, VOCs, and SVOCs were less than the threshold values. Note that PAHs have historically been detected. Arsenic has not been detected in the past, and the published laboratory reporting limit for arsenic is a conservative value relative to the risk-based level. All of the respective reporting limits were only slightly greater than the respective threshold concentrations.

5 Conclusions

Fuss & O'Neill collected field and analytical data to characterize the crumb rubber at three fields in Needham, Massachusetts in November, 2021. The analytical results were compared to MassDEP and EPA risk-based guidance levels for soil, to evaluate potential health risks associated with the use of the crumb rubber media on these athletic fields. The estimated concentration of acetone in one of three samples exceeded the MassDEP threshold toxicity value, which is a noncancer risk-based concentration

² EPA, May 2021. "Regional Screening Levels – Generic Tables." <https://www.epa.gov/risk/regional-screening-levels-rsls-generic-tables>, accessed November 2021.

used to develop single chemical threshold values in residential settings.. As noted above, acetone may be present in the sample as a result of laboratory technique. With the exception of three compounds (arsenic, and PAH compounds dibenz[a,h]anthracene and benzo[a]pyrene) whose laboratory reporting limits exceeded threshold values, the remaining detections for metals, VOCs, and SVOCs were less than the threshold values. Note that PAHs have historically been detected. Arsenic has not been detected in the past, and the published laboratory reporting limit for arsenic is a conservative value relative to the risk-based level. All of the respective reporting limits were only slightly greater than the respective threshold concentrations.

Tables

Table 1
Summary of Crumb Rubber Monitoring Results – November 1, 2021

Analyte	Analytical Results			Risk-Based Levels
	Memorial Park	DeFazio Park		
	Needham High School 1609211101-03	Brock Field 1609211101-02	Founders Field 1609211101-01	
Polycyclic Aromatic Hydrocarbons** – dry weight (mg/kg) by method 3546/8270D				
2-Methylnaphthalene	ND <11	ND <11	ND <12	280
Acenaphthene	ND <1.1	ND <1.1	ND <1.2	4,300
Acenaphthylene	ND <1.1	ND <1.1	ND <1.2	2,100
Anthracene	ND <1.1	ND <1.1	ND <1.2	21,000
Benzo(a)anthracene	ND <1.1	ND <1.1	ND <1.2	7.2
Benzo(a)pyrene	ND <1.1	ND <1.1	ND <1.2	0.72
Benzo(b)fluoranthene	ND <1.1	ND <1.1	ND <1.2	7.2
Benzo(g,h,i)perylene	ND <1.1	ND <1.1	ND <1.2	2,100
Benzo(k)fluoranthene	ND <1.1	ND <1.1	ND <1.2	72
Chrysene	1.6	2.5	2.1	72
Dibenz(a,h)anthracene	ND <1.1	ND <1.1	ND <1.2	0.72
Fluoranthene	3.5	3.4	3.8	2,800
Fluorene	ND <1.1	ND <1.1	ND <1.2	2,800
Indeno(1,2,3-cd)pyrene	ND <1.1	ND <1.1	ND <1.2	72
Naphthalene	ND <1.1	ND <1.1	ND <1.2	1,400
Phenanthrene	ND <1.1	1.2	ND <1.2	2,100
Pyrene	9.0	9.0	9.6	2,100
Volatile organic compounds – vapor (mg/m³) Closed Container Test by method TO-15				
1-Propene, 2-Methyl-*	0.063	0.060	0.064	NE
Carbonyl Sulfide*	0.056	0.130	0.180	NE
Acetone	0.260	1.800	0.510	0.8
2-Butanone (MEK)	ND <0.015	0.200	ND <0.015	5.00
4-Methyl-2-Pentanone (MIBK)	0.060	0.053	0.038	3.00
Methylene Chloride	0.019	ND <0.017	ND <0.017	0.6
Tert-Butyl Alcohol	0.030	ND <0.015	ND <0.015	NE

* Tentatively-identified compound

**For the SVOC full list, refer to the laboratory analytical report

ND: None Detected; NE: risk threshold not established by MassDEP or EPA.

NE [X]: not established by MassDEP, value is EPA “regional screening level” for risk screening at Superfund sites.

Chromium risk level conservatively assumes hexavalent (Cr-VI) form.

VOCs and TICs were only reported if detected in at least one sample.

Underlined value indicates that the detected value exceeds the Risk Based Level.

Italicized value indicates that the laboratory reporting limit exceeds the Risk Based Level.

Table 1
Summary of Crumb Rubber Monitoring Results – November 1, 2021

Analyte	Analytical Results			Risk-Based Levels
	<u>Memorial Park</u>	<u>DeFazio Park</u>		
	Needham High School 1609211101-03	Brock Field 1609211101-02	Founders Field 1609211101-01	
Total Metals – dry weight (mg/kg) by methods 6010D & 7471B				
Arsenic	ND <2.4	ND <2.7	ND <2.7	2.2
Cadmium	ND <0.61	ND <0.69	ND <0.67	71
Chromium	ND <2.4	10.2	ND <2.7	130
Iron	342	722	732	NE [55,000]
Lead	11.2	8.7	8.5	110
Manganese	4.1	5.8	6.1	NE [1,800]
Mercury	ND <0.031	ND <0.031	ND <0.034	18
Selenium	ND <2.4	ND <2.7	ND <2.7	380
Zinc	12,200	10,400	11,300	13,000

* Tentatively-identified compound

**For the SVOC full list, refer to the laboratory analytical report

ND: None Detected; NE: risk threshold not established by MassDEP or EPA.

NE [X]: not established by MassDEP, value is EPA “regional screening level” for risk screening at Superfund sites.

Chromium risk level conservatively assumes hexavalent (Cr-VI) form.

VOCs and TICs were only reported if detected in at least one sample.

Underlined value indicates that the detected value exceeds the Risk Based Level.

Italicized value indicates that the laboratory reporting limit exceeds the Risk Based Level.

Table 2
Real-Time Measurements, Needham Crumb Rubber Sampling – November 1, 2021

Location	VOC (ppm)	Temperature (°F)	RH (%)
Needham High School (HS)	0.4	64.5	31.5
Brock Field (D1)	0.7	66.3	55.8
Founders Field (D2)	0.8	58.1	63.3

°F: degrees Fahrenheit

RH: Relative Humidity

Figures



MAP REFERENCE

THIS MAP WAS PREPARED FROM USGS ORTHOPHOTOGRAPHY, (c) 2013 MASSGIS.

SOURCE: OFFICE OF GEOGRAPHIC AND ENVIRONMENTAL INFORMATION (MASSGIS), COMMONWEALTH OF MASSACHUSETTS EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS.

MEMORIAL FIELD BOUNDARIES APPROXIMATE BASED ON SITE OBSERVATIONS

LEGEND

PARK BOUNDARY

SAMPLE LOCATIONS TO FORM COMPOSITE

SCALE:
HORZ.: 1" = 150'
VERT.:
DATUM:
HORZ.:
VERT.:
0 75' 150'
GRAPHIC SCALE



FUSS & O'NEILL

108 MYRTLE STREET, SUITE 502
 QUINCY, MA 02171
 617.282.4675
 www.fando.com

NEEDHAM HEALTH DEPARTMENT

SITE PLAN
 MEMORIAL PARK
 92 ROSEMARY ROAD

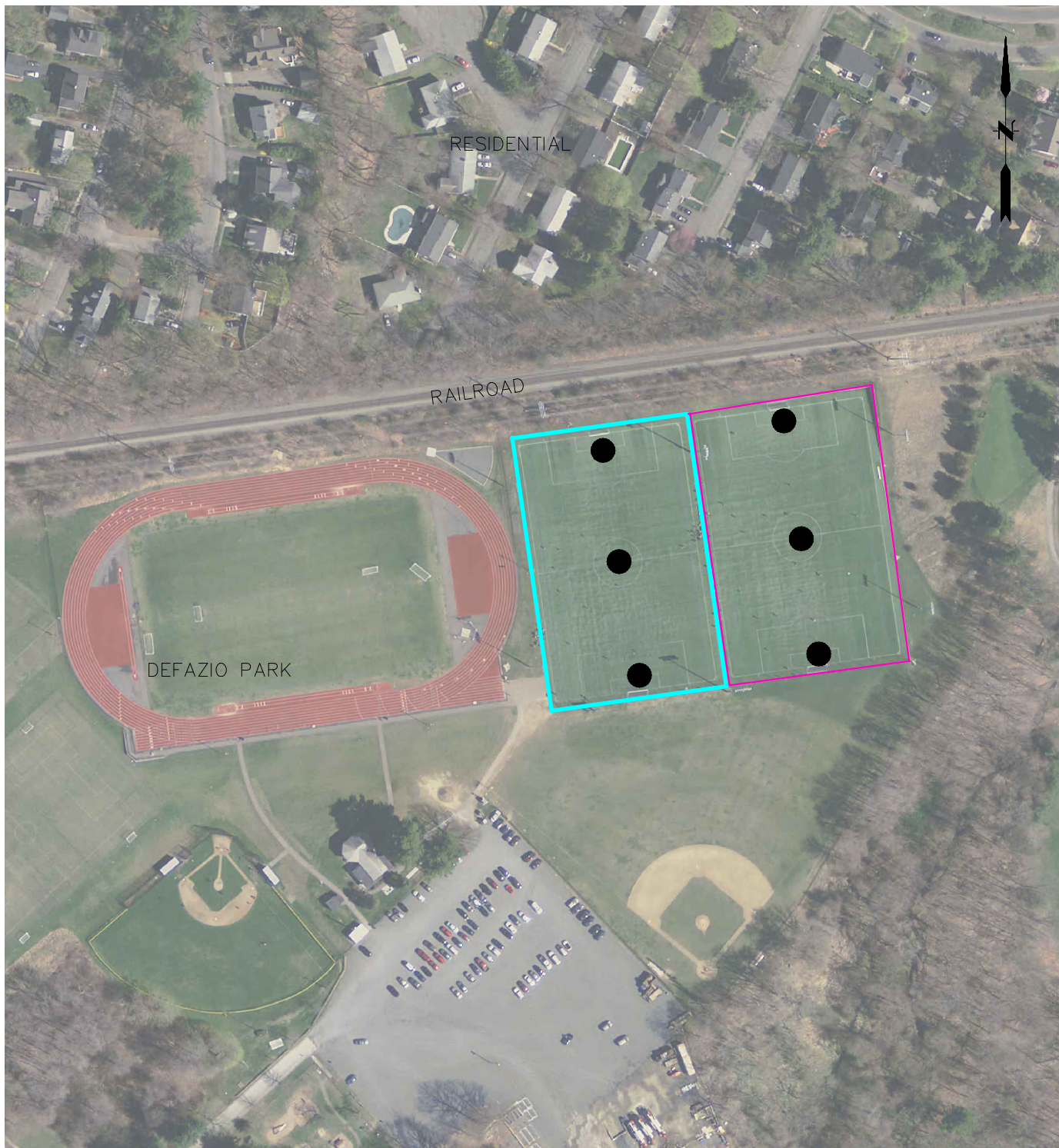
NEEDHAM

MASSACHUSETTS

PROJ. No.: 20081266.B10
 DATE: JUNE 2020

FIGURE 1

LAYER STATE:



MAP REFERENCE

THIS MAP WAS PREPARED FROM USGS ORTHOPHOTOGRAPHY, (c) 2013 MASSGIS.

SOURCE: OFFICE OF GEOGRAPHIC AND ENVIRONMENTAL INFORMATION (MASSGIS), COMMONWEALTH OF MASSACHUSETTS EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS.

FIELD BOUNDARIES APPROXIMATE BASED ON SITE OBSERVATIONS

LEGEND

- FOUNDERS FIELD BOUNDARY
- BROCK FIELD BOUNDARY
- SAMPLE LOCATIONS TO FORM COMPOSITE

SCALE:	
HORZ.: 1" = 150'	
VERT.:	
DATUM:	
HORZ.:	
VERT.:	
GRAPHIC SCALE	



FUSS & O'NEILL

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NEEDHAM HEALTH DEPARTMENT

SITE PLAN
 DEFAZIO PARK
 380 DEDHAM ROAD

NEEDHAM

MASSACHUSETTS

PROJ. No.: 20081266.B10
 DATE: JUNE 2020

FIGURE 2

Appendix A

Laboratory Analytical Reports & Chain of Custody Forms

**EMSL ANALYTICAL, INC.**

200 Route 130 North
Cinnaminson, NJ 08077
Telephone: (856)858-4800 FAX: (856)858-4571
to15lab@EMSL.com | <http://www.EMSL.com>

EMSL ORDER ID: 492100661
EMSL CUSTOMER ID: ENVI54

Attention: Dan LaFrance
Fuss & O'Neill, Inc.
146 Hartford Road
Manchester, CT 06040

Customer PO: 20081266.B20
EMSL Project ID:
Project Name: Needham Crumb Rubber -- 20081266.B20

Phone: 860-646-2469
Email: dlafrance@fando.com

Collected: 11/01/2021 11:15
Received: 11/02/2021 09:40
Analyzed: See Results
Reported: 12/13/2021

Laboratory Report- Sample Summary

EMSL Sample ID.	Client Sample ID.	Start Sampling Date	Start Sampling Time
492100661-0001	1609211101-01	11/1/2021	9:45 AM
492100661-0002	1609211101-02	11/1/2021	10:30 AM
492100661-0003	1609211101-03	11/1/2021	11:15 AM
492100661-BCKG	Laboratory Background	11/15/2021	2:30 PM

If "Preliminary Report" is displayed in the signature box; this indicates that there are samples that have not yet been analyzed, that are in a preliminary state, or that analysis is in progress but not completed at the time of report issue.

Report Date	Report Revision	Revision Comments
11/16/2021	R0	Initial Report
12/13/2021	R1	Updated TVOC page

Owen McKenna, National Organics Manager
or other approved signatory

**Test results meet all NELAP requirements unless
otherwise specified. NJDEP Certification #: 03036**

EMSL maintains liability limited to cost of analysis. Interpretation and use of test results are the responsibility of the client. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. The report reflects the samples as received. Results are generated from the field sampling data (sampling volumes and areas, locations, etc.) provided by the client on the Chain of Custody. Samples are within quality control criteria and met method specifications unless otherwise noted.

**EMSL ANALYTICAL, INC.**

200 Route 130 North
Cinnaminson, NJ 08077
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EMSL ORDER ID: 492100661
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Attention: Dan LaFrance
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146 Hartford Road
Manchester, CT 06040

Customer PO: 20081266.B20
EMSL Project ID:
Project Name: Needham Crumb Rubber -- 20081266.B20

Phone: 860-646-2469
Email: dlafrance@fando.com

Collected: 11/01/2021 11:15
Received: 11/02/2021 09:40
Analyzed: See Results
Reported: 12/13/2021

Case Narrative

Method Reference

USEPA: Compendium Method TO-15, "Determination of Volatile Organic Compounds (VOCs) in Air..." Collected in Specially-Prepared Canisters and Analyzed by Gas Chromatography/Mass Spectrometry (GC/MS), January 1999, (EPA/625/R-96/010b).

Column

Restek RTX-502.2, 60m, 0.25mm ID, 1.4um

Concentrator Traps:

Entech Dual Cold Traps: (1) 1/8" No Packing, (2) 1/8" Tenax.

Gas Standards:

Certified Gas standards were used for all analyses.

Sample Volumes:

Sample volume aliquots for this procedure are 250cc for indoor/ ambient air and 25cc for soil gas. Other volumes for sample dilutions are reflected on each result page.

Holding Times:

Standard holding times of 30 days were met for all samples.

Sampling Pressures:

All samples were received at acceptable pressure/vacuum unless listed below.
Bulk samples for off gas analysis.

Sample Dilutions:

Dilutions reported are designated by the sample # with a "DL" suffix resulting from initial analysis having compounds exceeding calibration as reported with an "E" qualifier. Ethanol and Isopropanol are not diluted for and may be reported with an "E" qualifier on the final result.

QA/QC criteria outside method specifications are listed below (if applicable).

Initial Calibration

All Initial Calibration criteria met method specification.

Initial Calibration Verification Standard (ICVS)- Second Source

ICVS met method specification with 70-130% recovery for 100% of compounds.

Laboratory Control Sample (LCS)

LCS met method specification with 70-130% recovery for 100% of compounds. (If the LCS does not meet criteria but any compounds which have recoveries >130% are not found in the samples, samples may be reported)

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Attention: Dan LaFrance
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EMSL ORDER ID: 492100661
EMSL CUSTOMER ID: ENVI54

Customer PO: 20081266.B20
EMSL Project ID:
Project Name: Needham Crumb Rubber -- 20081266.B20

Collected: 11/01/2021 11:15
Received: 11/02/2021 09:40
Analyzed: See Results
Reported: 12/13/2021

Case Narrative

Continuing Calibration Verification Standard (CCVS)

CCVS met method specification with all compounds within 30% deviation.

Ending Calibration Verification Standard (ECVS)

ECVS met method specification with all compounds within 30% deviation.

Method Blanks (MB)

Method Blank met method specification.

Reporting Limit Laboratory Control Samples (RLLCS)

RLLCS met method specification with 90% of compounds within the 60-140% recovery range. Individual compounds outside of the recovery range may be listed below.

Manual Integration : -Listed below if applicable. Before and after documentation provided in extended deliverable packages.

The following data qualifiers that may have been reported with the data.

ND- Non Detect. This notation would be used in the results column in lieu of a "U" qualifier.

U- Compound was analyzed for but not detected at a listed and appropriately adjusted reporting level.

J (Target)- Concentration estimated between Reporting Limit and MDL.

J- Estimated value reported below adjusted reporting limit for target compounds or estimating a concentration for TICs where a 1:1 response is assumed

B- Compound found in associated method blank as well as in the sample.

E- Estimated value exceeding upper calibration range of instrument. Ethanol and isopropyl alcohol are not specifically targeted to dilute within calibration range.

D- Compound reported from additional diluted analysis.

N- indicates presumptive evidence of a compound based on library search match.

EMSL Analytical, Inc. certifies that this data package is in compliance with the terms and conditions of this contract, both technically and for completeness, for other than the conditions detailed above. Release of the data contained in this hardcopy data package and in the computer –readable data submitted on diskette has been authorized by the laboratory manager or his/her designee, as verified by the following signature.

Owen McKenna, National Organics Manager
or other approved signatory

**EMSL ANALYTICAL, INC.**

200 Route 130 North
 Cinnaminson, NJ 08077
 Telephone: (856)858-4800 FAX: (856)858-4571
to15lab@EMSL.com | <http://www.EMSL.com>

EMSL ORDER ID: 492100661
EMSL CUSTOMER ID: ENVI54
EMSL SAMPLE ID: 492100661-0001
CUSTOMER SAMPLE ID: 1609211101-01

Attention: Dan LaFrance
 Fuss & O'Neill, Inc.
 146 Hartford Road
 Manchester, CT 06040

Customer PO: 20081266.B20
EMSL Project ID:
Project Name: Needham Crumb Rubber -- 20081266.B20

Phone: 860-646-2469
Email: dlafrance@fando.com

Collected: 11/01/2021 09:45
Received: 11/02/2021 09:40
Analyzed: See Results
Reported: 11/16/2021

Analysis Initial	Analysis Date	Analyst Init.	Lab File ID	Canister ID	Sample Vol.	Dil. Factor
	11/16/2021	KW	y05120.D	JARL7	25 cc	10

Target Compound Results Summary

Target Compounds	CAS#	MW	Result ppbv	RL ppbv	Q	Result ug/m3	RL ug/m3	Comments
Propylene	115-07-1	42.08	ND	10		ND	17	
Freon 12(Dichlorodifluoromethane)	75-71-8	120.9	ND	5.0		ND	25	
Freon 114(1,2-Dichlorotetrafluoroethane)	76-14-2	170.9	ND	5.0		ND	35	
Chloromethane	74-87-3	50.49	ND	5.0		ND	10	
n-Butane	106-97-8	58.12	ND	5.0		ND	12	
Vinyl chloride	75-01-4	62.50	ND	5.0		ND	13	
1,3-Butadiene	106-99-0	54.09	ND	5.0		ND	11	
Bromomethane	74-83-9	94.94	ND	5.0		ND	19	
Chloroethane	75-00-3	64.51	ND	5.0		ND	13	
Ethanol	64-17-5	46.07	ND	5.0		ND	9.4	
Bromoethene(Vinyl bromide)	593-60-2	106.9	ND	5.0		ND	22	
Freon 11(Trichlorofluoromethane)	75-69-4	137.4	ND	5.0		ND	28	
Isopropyl alcohol(2-Propanol)	67-63-0	60.09	ND	5.0		ND	12	
Freon 113(1,1,2-Trichlorotrifluoroethane)	76-13-1	187.4	ND	5.0		ND	38	
Acetone	67-64-1	58.08	210	5.0		510	12	
1,1-Dichloroethene	75-35-4	96.94	ND	5.0		ND	20	
Acetonitrile	75-05-8	41.05	ND	5.0		ND	8.4	
Tertiary butyl alcohol(TBA)	75-65-0	74.12	ND	5.0		ND	15	
Bromoethane(Ethyl bromide)	74-96-4	109.0	ND	5.0		ND	22	
3-Chloropropene(Allyl chloride)	107-05-1	76.52	ND	5.0		ND	16	
Carbon disulfide	75-15-0	76.14	ND	5.0		ND	16	
Methylene chloride	75-09-2	84.93	ND	5.0		ND	17	
Acrylonitrile	107-13-1	53.08	ND	5.0		ND	11	
Methyl-tert-butyl ether(MTBE)	1634-04-4	88.15	ND	5.0		ND	18	
trans-1,2-Dichloroethene	156-60-5	96.94	ND	5.0		ND	20	
n-Hexane	110-54-3	86.18	ND	5.0		ND	18	
1,1-Dichloroethane	75-34-3	98.96	ND	5.0		ND	20	
Vinyl acetate	108-05-4	86.09	ND	5.0		ND	18	
2-Butanone(MEK)	78-93-3	72.11	ND	5.0		ND	15	
cis-1,2-Dichloroethene	156-59-2	96.94	ND	5.0		ND	20	
Ethyl acetate	141-78-6	88.11	ND	5.0		ND	18	
Chloroform	67-66-3	119.4	ND	5.0		ND	24	
Tetrahydrofuran	109-99-9	72.11	ND	5.0		ND	15	
1,1,1-Trichloroethane	71-55-6	133.4	ND	5.0		ND	27	
Cyclohexane	110-82-7	84.16	ND	5.0		ND	17	
2,2,4-Trimethylpentane(Isooctane)	540-84-1	114.2	ND	5.0		ND	23	
Carbon tetrachloride	56-23-5	153.8	ND	5.0		ND	31	
n-Heptane	142-82-5	100.2	ND	5.0		ND	20	
1,2-Dichloroethane	107-06-2	98.96	ND	5.0		ND	20	
Benzene	71-43-2	78.11	ND	5.0		ND	16	
Trichloroethene	79-01-6	131.4	ND	5.0		ND	27	
1,2-Dichloropropane	78-87-5	113.0	ND	5.0		ND	23	
Methyl Methacrylate	80-62-6	100.1	ND	5.0		ND	20	
Bromodichloromethane	75-27-4	163.8	ND	5.0		ND	33	
1,4-Dioxane	123-91-1	88.11	ND	5.0		ND	18	

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**EMSL ANALYTICAL, INC.**

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Attention: Dan LaFrance
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146 Hartford Road
Manchester, CT 06040

Phone: 860-646-2469
Email: dlafrance@fando.com

EMSL ORDER ID: 492100661
EMSL CUSTOMER ID: ENVI54
EMSL SAMPLE ID: 492100661-0001
CUSTOMER SAMPLE ID: 1609211101-01

Customer PO: 20081266.B20
EMSL Project ID:
Project Name: Needham Crumb Rubber -- 20081266.B20

Collected: 11/01/2021 09:45
Received: 11/02/2021 09:40
Analyzed: See Results
Reported: 11/16/2021

Analysis Initial	Analysis Date	Analyst Init.	Lab File ID	Canister ID	Sample Vol.	Dil. Factor
	11/16/2021	KW	y05120.D	JARL7	25 cc	10

Target Compound Results Summary

Target Compounds	CAS#	MW	Result ppbv	RL ppbv	Q	Result ug/m3	RL ug/m3	Comments
4-Methyl-2-pentanone(MIBK)	108-10-1	100.2	9.2	5.0		38	20	
cis-1,3-Dichloropropene	10061-01-5	111.0	ND	5.0		ND	23	
Toluene	108-88-3	92.14	ND	5.0		ND	19	
trans-1,3-Dichloropropene	10061-02-6	111.0	ND	5.0		ND	23	
1,1,2-Trichloroethane	79-00-5	133.4	ND	5.0		ND	27	
2-Hexanone(MBK)	591-78-6	100.2	ND	5.0		ND	20	
Tetrachloroethene	127-18-4	165.8	ND	5.0		ND	34	
Dibromochloromethane	124-48-1	208.3	ND	5.0		ND	43	
1,2-Dibromoethane	106-93-4	187.9	ND	5.0		ND	38	
Chlorobenzene	108-90-7	112.6	ND	5.0		ND	23	
Ethylbenzene	100-41-4	106.2	ND	5.0		ND	22	
Xylene (p,m)	1330-20-7	106.2	ND	10		ND	43	
Xylene (Ortho)	95-47-6	106.2	ND	5.0		ND	22	
Styrene	100-42-5	104.1	ND	5.0		ND	21	
Isopropylbenzene (cumene)	98-82-8	120.2	ND	5.0		ND	25	
Bromoform	75-25-2	252.7	ND	5.0		ND	52	
1,1,2,2-Tetrachloroethane	79-34-5	167.9	ND	5.0		ND	34	
4-Ethyltoluene	622-96-8	120.2	ND	5.0		ND	25	
1,3,5-Trimethylbenzene	108-67-8	120.2	ND	5.0		ND	25	
2-Chlorotoluene	95-49-8	126.6	ND	5.0		ND	26	
1,2,4-Trimethylbenzene	95-63-6	120.2	ND	5.0		ND	25	
1,3-Dichlorobenzene	541-73-1	147.0	ND	5.0		ND	30	
1,4-Dichlorobenzene	106-46-7	147.0	ND	5.0		ND	30	
Benzyl chloride	100-44-7	126.6	ND	5.0		ND	26	
1,2-Dichlorobenzene	95-50-1	147.0	ND	5.0		ND	30	
1,2,4-Trichlorobenzene	120-82-1	181.4	ND	5.0		ND	37	
Hexachloro-1,3-butadiene	87-68-3	260.8	ND	5.0		ND	53	
Naphthalene	91-20-3	128.2	ND	5.0		ND	26	
Total Target Compound Concentrations:			220	ppbv		550	ug/m3	

Surrogate

4-Bromofluorobenzene

Result

9.3

Spike

10

Recovery

93%

Qualifier Definitions**ND = Non Detect**

B = Compound also found in method blank.

E= Estimated concentration exceeding upper calibration range.

D= Result reported from diluted analysis.

J= Concentration estimated between Reporting Limit and MDL.

Method Reference

USEPA: Compendium Method TO-15, "Determination of Volatile Organic Compounds (VOCs) in Air..." Collected in Specially-Prepared Canisters and Analyzed by Gas Chromatography/Mass Spectrometry (GC/MS), January 1999, (EPA/625/R-96/010b).

EMSL ANALYTICAL, INC.

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EMSL ORDER ID: 492100661

EMSL CUSTOMER ID: ENVI54

EMSL SAMPLE ID: 492100661-0001

CUSTOMER SAMPLE ID: 1609211101-01

Attention: Dan LaFrance
Fuss & O'Neill, Inc.
146 Hartford Road
Manchester, CT 06040

Customer PO: 20081266.B20
EMSL Project ID:
Project Name: Needham Crumb Rubber -- 20081266.B20

Phone: 860-646-2469
Email: dlafrance@fando.com

Collected: 11/01/2021 09:45
Received: 11/02/2021 09:40
Analyzed: See Results
Reported: 11/16/2021

Analysis Initial	Analysis Date	Analyst Init.	Lab File ID	Canister ID	Sample Vol.	Dil. Factor
	11/16/2021	KW	y05120.D	JARL7	25 cc	10

Tentatively Identified Compound Results Summary

[illegible]

Qualifier Definitions

(1) = If unknown, MW is assigned as equivalent Toluene (92) for ug/m3 conversion purposes.

B = Compound also found in method blank.

J= Estimated value based on a 1:1 response to internal standard.

N= Presumptive evidence of compound based on library match.

Method Reference

USEPA: Compendium Method TO-15, "Determination of Volatile Organic Compounds (VOCs) in Air..." Collected in Specially-Prepared Canisters and Analyzed by Gas Chromatography/Mass Spectrometry (GC/MS), January 1999, (EPA/625/R-96/010b).

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EMSL ORDER ID: 492100661
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CUSTOMER SAMPLE ID: 1609211101-01

Customer PO: 20081266.B20
EMSL Project ID:
Project Name: Needham Crumb Rubber -- 20081266.B20

Collected: 11/01/2021 09:45
Received: 11/02/2021 09:40
Analyzed: See Results
Reported: 11/16/2021

Analysis Initial	Analysis Date	Analyst Init.	Lab File ID	Canister ID	Sample Vol.	Dil. Factor
	11/16/2021	KW	y05120.D	JARL7	25 cc	10

Total Volatile Organic Compounds (TVOC) Summary

Target Compounds	CAS#	MW	Result ppbv	RL ppbv	Q	Result ug/m3	RL ug/m3	Comments
Acetone	67-64-1	58.08	210	5.0		510	12	
4-Methyl-2-pentanone(MIBK)	108-10-1	100.2	9.2	5.0		38	20	
Total Target Compound Concentrations:			220	ppbv		550	ug/m3	

Qualifier Definitions

B = Compound also found in method blank.
E = Estimated concentration exceeding upper calibration range.
D = Result reported from diluted analysis.
J = Concentration estimated between Reporting Limit and MDL.

Tentatively Identified Compounds	CAS#	MW(1)	Result ppbv		Q	Result ug/m3	Retention Time	Comments
Carbonyl sulfide	000463-58-1	60	72		JN	180	5.393	
1-Propene, 2-methyl-	000115-11-7	56	28		JN	64	6.21	
Total TIC Concentrations:			100	ppbv		240	ug/m3	

Qualifier Definitions

(1) = If unknown, MW is assigned as equivalent Toluene (92) for ug/m3 conversion purposes.
B = Compound also found in method blank.
J = Estimated value based on a 1:1 response to internal standard.
N = Presumptive evidence of compound based on library match.

Total Volatile Organic Compounds (TVOCs): 320 ppbv 790 ug/m3

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EMSL ORDER ID: 492100661
EMSL CUSTOMER ID: ENVI54
EMSL SAMPLE ID: 492100661-0002
CUSTOMER SAMPLE ID: 1609211101-02

Attention: Dan LaFrance
 Fuss & O'Neill, Inc.
 146 Hartford Road
 Manchester, CT 06040

Customer PO: 20081266.B20
EMSL Project ID:
Project Name: Needham Crumb Rubber -- 20081266.B20

Phone: 860-646-2469
Email: dlafrance@fando.com

Collected: 11/01/2021 10:30
Received: 11/02/2021 09:40
Analyzed: See Results
Reported: 11/16/2021

Analysis Initial	Analysis Date	Analyst Init.	Lab File ID	Canister ID	Sample Vol.	Dil. Factor
	11/16/2021	KW	y05121.D	JARI	25 cc	10

Target Compound Results Summary

Target Compounds	CAS#	MW	Result ppbv	RL ppbv	Q	Result ug/m3	RL ug/m3	Comments
Propylene	115-07-1	42.08	ND	10		ND	17	
Freon 12(Dichlorodifluoromethane)	75-71-8	120.9	ND	5.0		ND	25	
Freon 114(1,2-Dichlorotetrafluoroethane)	76-14-2	170.9	ND	5.0		ND	35	
Chloromethane	74-87-3	50.49	ND	5.0		ND	10	
n-Butane	106-97-8	58.12	ND	5.0		ND	12	
Vinyl chloride	75-01-4	62.50	ND	5.0		ND	13	
1,3-Butadiene	106-99-0	54.09	ND	5.0		ND	11	
Bromomethane	74-83-9	94.94	ND	5.0		ND	19	
Chloroethane	75-00-3	64.51	ND	5.0		ND	13	
Ethanol	64-17-5	46.07	ND	5.0		ND	9.4	
Bromoethene(Vinyl bromide)	593-60-2	106.9	ND	5.0		ND	22	
Freon 11(Trichlorofluoromethane)	75-69-4	137.4	ND	5.0		ND	28	
Isopropyl alcohol(2-Propanol)	67-63-0	60.09	ND	5.0		ND	12	
Freon 113(1,1,2-Trichlorotrifluoroethane)	76-13-1	187.4	ND	5.0		ND	38	
Acetone	67-64-1	58.08	780	5.0	E	1800	12	
1,1-Dichloroethene	75-35-4	96.94	ND	5.0		ND	20	
Acetonitrile	75-05-8	41.05	ND	5.0		ND	8.4	
Tertiary butyl alcohol(TBA)	75-65-0	74.12	ND	5.0		ND	15	
Bromoethane(Ethyl bromide)	74-96-4	109.0	ND	5.0		ND	22	
3-Chloropropene(Allyl chloride)	107-05-1	76.52	ND	5.0		ND	16	
Carbon disulfide	75-15-0	76.14	ND	5.0		ND	16	
Methylene chloride	75-09-2	84.93	ND	5.0		ND	17	
Acrylonitrile	107-13-1	53.08	ND	5.0		ND	11	
Methyl-tert-butyl ether(MTBE)	1634-04-4	88.15	ND	5.0		ND	18	
trans-1,2-Dichloroethene	156-60-5	96.94	ND	5.0		ND	20	
n-Hexane	110-54-3	86.18	ND	5.0		ND	18	
1,1-Dichloroethane	75-34-3	98.96	ND	5.0		ND	20	
Vinyl acetate	108-05-4	86.09	ND	5.0		ND	18	
2-Butanone(MEK)	78-93-3	72.11	68	5.0		200	15	
cis-1,2-Dichloroethene	156-59-2	96.94	ND	5.0		ND	20	
Ethyl acetate	141-78-6	88.11	ND	5.0		ND	18	
Chloroform	67-66-3	119.4	ND	5.0		ND	24	
Tetrahydrofuran	109-99-9	72.11	ND	5.0		ND	15	
1,1,1-Trichloroethane	71-55-6	133.4	ND	5.0		ND	27	
Cyclohexane	110-82-7	84.16	ND	5.0		ND	17	
2,2,4-Trimethylpentane(Isooctane)	540-84-1	114.2	ND	5.0		ND	23	
Carbon tetrachloride	56-23-5	153.8	ND	5.0		ND	31	
n-Heptane	142-82-5	100.2	ND	5.0		ND	20	
1,2-Dichloroethane	107-06-2	98.96	ND	5.0		ND	20	
Benzene	71-43-2	78.11	ND	5.0		ND	16	
Trichloroethene	79-01-6	131.4	ND	5.0		ND	27	
1,2-Dichloropropane	78-87-5	113.0	ND	5.0		ND	23	
Methyl Methacrylate	80-62-6	100.1	ND	5.0		ND	20	
Bromodichloromethane	75-27-4	163.8	ND	5.0		ND	33	
1,4-Dioxane	123-91-1	88.11	ND	5.0		ND	18	

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**EMSL ANALYTICAL, INC.**

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EMSL ORDER ID: 492100661
EMSL CUSTOMER ID: ENVI54
EMSL SAMPLE ID: 492100661-0002
CUSTOMER SAMPLE ID: 1609211101-02

Customer PO: 20081266.B20
EMSL Project ID:
Project Name: Needham Crumb Rubber -- 20081266.B20

Collected: 11/01/2021 10:30
Received: 11/02/2021 09:40
Analyzed: See Results
Reported: 11/16/2021

Analysis Initial	Analysis Date	Analyst Init.	Lab File ID	Canister ID	Sample Vol.	Dil. Factor
	11/16/2021	KW	y05121.D	JARI	25 cc	10

Target Compound Results Summary

Target Compounds	CAS#	MW	Result ppbv	RL ppbv	Q	Result ug/m3	RL ug/m3	Comments
4-Methyl-2-pentanone(MIBK)	108-10-1	100.2	13	5.0		53	20	
cis-1,3-Dichloropropene	10061-01-5	111.0	ND	5.0		ND	23	
Toluene	108-88-3	92.14	ND	5.0		ND	19	
trans-1,3-Dichloropropene	10061-02-6	111.0	ND	5.0		ND	23	
1,1,2-Trichloroethane	79-00-5	133.4	ND	5.0		ND	27	
2-Hexanone(MBK)	591-78-6	100.2	ND	5.0		ND	20	
Tetrachloroethene	127-18-4	165.8	ND	5.0		ND	34	
Dibromochloromethane	124-48-1	208.3	ND	5.0		ND	43	
1,2-Dibromoethane	106-93-4	187.9	ND	5.0		ND	38	
Chlorobenzene	108-90-7	112.6	ND	5.0		ND	23	
Ethylbenzene	100-41-4	106.2	ND	5.0		ND	22	
Xylene (p,m)	1330-20-7	106.2	ND	10		ND	43	
Xylene (Ortho)	95-47-6	106.2	ND	5.0		ND	22	
Styrene	100-42-5	104.1	ND	5.0		ND	21	
Isopropylbenzene (cumene)	98-82-8	120.2	ND	5.0		ND	25	
Bromoform	75-25-2	252.7	ND	5.0		ND	52	
1,1,2,2-Tetrachloroethane	79-34-5	167.9	ND	5.0		ND	34	
4-Ethyltoluene	622-96-8	120.2	ND	5.0		ND	25	
1,3,5-Trimethylbenzene	108-67-8	120.2	ND	5.0		ND	25	
2-Chlorotoluene	95-49-8	126.6	ND	5.0		ND	26	
1,2,4-Trimethylbenzene	95-63-6	120.2	ND	5.0		ND	25	
1,3-Dichlorobenzene	541-73-1	147.0	ND	5.0		ND	30	
1,4-Dichlorobenzene	106-46-7	147.0	ND	5.0		ND	30	
Benzyl chloride	100-44-7	126.6	ND	5.0		ND	26	
1,2-Dichlorobenzene	95-50-1	147.0	ND	5.0		ND	30	
1,2,4-Trichlorobenzene	120-82-1	181.4	ND	5.0		ND	37	
Hexachloro-1,3-butadiene	87-68-3	260.8	ND	5.0		ND	53	
Naphthalene	91-20-3	128.2	ND	5.0		ND	26	
Total Target Compound Concentrations:			860	ppbv		2100	ug/m3	

Surrogate

4-Bromofluorobenzene

Result

9.2

Spike

10

Recovery

92%

Qualifier Definitions**ND = Non Detect**

B = Compound also found in method blank.

E= Estimated concentration exceeding upper calibration range.

D= Result reported from diluted analysis.

J= Concentration estimated between Reporting Limit and MDL.

Method Reference

USEPA: Compendium Method TO-15, "Determination of Volatile Organic Compounds (VOCs) in Air..." Collected in Specially-Prepared Canisters and Analyzed by Gas Chromatography/Mass Spectrometry (GC/MS), January 1999, (EPA/625/R-96/010b).

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EMSL ORDER ID: 492100661

EMSL CUSTOMER ID: ENVI54

EMSL SAMPLE ID: 492100661-0002

CUSTOMER SAMPLE ID: 1609211101-02

Attention: Dan LaFrance
Fuss & O'Neill, Inc.
146 Hartford Road
Manchester, CT 06040

Customer PO: 20081266.B20
EMSL Project ID:
Project Name: Needham Crumb Rubber -- 20081266.B20

Phone: 860-646-2469
Email: dlafrance@fando.com

Collected: 11/01/2021 10:30
Received: 11/02/2021 09:40
Analyzed: See Results
Reported: 11/16/2021

Analysis Initial	Analysis Date	Analyst Init.	Lab File ID	Canister ID	Sample Vol.	Dil. Factor
	11/16/2021	KW	y05121.D	JARI	25 cc	10

Tentatively Identified Compound Results Summary

Tentatively Identified Compounds	CAS#	MW(1)	Result ppbv	Q	Result ug/m3	Retention Time	Comments
Carbonyl sulfide	000463-58-1	60	53	JN	130	5.393	
1-Propene, 2-methyl-	000115-11-7	56	26	JN	60	6.21	
Total TIC Concentrations:			79	ppbv	190	ug/m3	

Qualifier Definitions

(1) = If unknown, MW is assigned as equivalent Toluene (92) for ug/m3 conversion purposes.

B = Compound also found in method blank.

J= Estimated value based on a 1:1 response to internal standard.

N= Presumptive evidence of compound based on library match.

Method Reference

USEPA: Compendium Method TO-15, "Determination of Volatile Organic Compounds (VOCs) in Air..." Collected in Specially-Prepared Canisters and Analyzed by Gas Chromatography/Mass Spectrometry (GC/MS), January 1999, (EPA/625/R-96/010b).

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Attention: Dan LaFrance
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146 Hartford Road
Manchester, CT 06040

EMSL ORDER ID: 492100661
EMSL CUSTOMER ID: ENVI54
EMSL SAMPLE ID: 492100661-0002
CUSTOMER SAMPLE ID: 1609211101-02

Customer PO: 20081266.B20
EMSL Project ID:
Project Name: Needham Crumb Rubber -- 20081266.B20

Phone: 860-646-2469
Email: dlafrance@fando.com

Collected: 11/01/2021 10:30
Received: 11/02/2021 09:40
Analyzed: See Results
Reported: 11/16/2021

Analysis Initial	Analysis Date	Analyst Init.	Lab File ID	Canister ID	Sample Vol.	Dil. Factor
	11/16/2021	KW	y05121.D	JARI	25 cc	10

Total Volatile Organic Compounds (TVOC) Summary

Target Compounds	CAS#	MW	Result ppbv	RL ppbv	Q	Result ug/m3	RL ug/m3	Comments
Acetone	67-64-1	58.08	780	5.0	E	1800	12	
2-Butanone(MEK)	78-93-3	72.11	68	5.0		200	15	
4-Methyl-2-pentanone(MIBK)	108-10-1	100.2	13	5.0		53	20	
Total Target Compound Concentrations:			860	ppbv		2100	ug/m3	

Qualifier Definitions

B = Compound also found in method blank.
E= Estimated concentration exceeding upper calibration range.
D= Result reported from diluted analysis.
J= Concentration estimated between Reporting Limit and MDL.

Tentatively Identified Compounds	CAS#	MW(1)	Result ppbv		Q	Result ug/m3	Retention Time	Comments
Carbonyl sulfide	000463-58-1	60	53		JN	130	5.393	
1-Propene, 2-methyl-	000115-11-7	56	26		JN	60	6.21	
Total TIC Concentrations:			79	ppbv		190	ug/m3	

Qualifier Definitions

(1) = If unknown, MW is assigned as equivalent Toluene (92) for ug/m3 conversion purposes.
B = Compound also found in method blank.
J= Estimated value based on a 1:1 response to internal standard.
N= Presumptive evidence of compound based on library match.

Total Volatile Organic Compounds (TVOCs): 940 ppbv 2300 ug/m3

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Attention: Dan LaFrance
Fuss & O'Neill, Inc.
146 Hartford Road
Manchester, CT 06040

Phone: 860-646-2469
Email: dlafrance@fando.com

EMSL ORDER ID: 492100661
EMSL CUSTOMER ID: ENVI54
EMSL SAMPLE ID: 492100661-0003
CUSTOMER SAMPLE ID: 1609211101-03

Customer PO: 20081266.B20
EMSL Project ID:
Project Name: Needham Crumb Rubber -- 20081266.B20

Collected: 11/01/2021 11:15
Received: 11/02/2021 09:40
Analyzed: See Results
Reported: 12/13/2021

Analysis Initial	Analysis Date	Analyst Init.	Lab File ID	Canister ID	Sample Vol.	Dil. Factor
	11/16/2021	KW	y05122.D	JARL5	25 cc	10

Target Compound Results Summary

Target Compounds	CAS#	MW	Result ppbv	RL ppbv	Q	Result ug/m3	RL ug/m3	Comments
Propylene	115-07-1	42.08	ND	10		ND	17	
Freon 12(Dichlorodifluoromethane)	75-71-8	120.9	ND	5.0		ND	25	
Freon 114(1,2-Dichlorotetrafluoroethane)	76-14-2	170.9	ND	5.0		ND	35	
Chloromethane	74-87-3	50.49	ND	5.0		ND	10	
n-Butane	106-97-8	58.12	ND	5.0		ND	12	
Vinyl chloride	75-01-4	62.50	ND	5.0		ND	13	
1,3-Butadiene	106-99-0	54.09	ND	5.0		ND	11	
Bromomethane	74-83-9	94.94	ND	5.0		ND	19	
Chloroethane	75-00-3	64.51	ND	5.0		ND	13	
Ethanol	64-17-5	46.07	ND	5.0		ND	9.4	
Bromoethene(Vinyl bromide)	593-60-2	106.9	ND	5.0		ND	22	
Freon 11(Trichlorofluoromethane)	75-69-4	137.4	ND	5.0		ND	28	
Isopropyl alcohol(2-Propanol)	67-63-0	60.09	ND	5.0		ND	12	
Freon 113(1,1,2-Trichlorotrifluoroethane)	76-13-1	187.4	ND	5.0		ND	38	
Acetone	67-64-1	58.08	110	5.0		260	12	
1,1-Dichloroethene	75-35-4	96.94	ND	5.0		ND	20	
Acetonitrile	75-05-8	41.05	ND	5.0		ND	8.4	
Tertiary butyl alcohol(TBA)	75-65-0	74.12	10	5.0		30	15	
Bromoethane(Ethyl bromide)	74-96-4	109.0	ND	5.0		ND	22	
3-Chloropropene(Allyl chloride)	107-05-1	76.52	ND	5.0		ND	16	
Carbon disulfide	75-15-0	76.14	ND	5.0		ND	16	
Methylene chloride	75-09-2	84.93	5.5	5.0		19	17	
Acrylonitrile	107-13-1	53.08	ND	5.0		ND	11	
Methyl-tert-butyl ether(MTBE)	1634-04-4	88.15	ND	5.0		ND	18	
trans-1,2-Dichloroethene	156-60-5	96.94	ND	5.0		ND	20	
n-Hexane	110-54-3	86.18	ND	5.0		ND	18	
1,1-Dichloroethane	75-34-3	98.96	ND	5.0		ND	20	
Vinyl acetate	108-05-4	86.09	ND	5.0		ND	18	
2-Butanone(MEK)	78-93-3	72.11	ND	5.0		ND	15	
cis-1,2-Dichloroethene	156-59-2	96.94	ND	5.0		ND	20	
Ethyl acetate	141-78-6	88.11	ND	5.0		ND	18	
Chloroform	67-66-3	119.4	ND	5.0		ND	24	
Tetrahydrofuran	109-99-9	72.11	ND	5.0		ND	15	
1,1,1-Trichloroethane	71-55-6	133.4	ND	5.0		ND	27	
Cyclohexane	110-82-7	84.16	ND	5.0		ND	17	
2,2,4-Trimethylpentane(Isooctane)	540-84-1	114.2	ND	5.0		ND	23	
Carbon tetrachloride	56-23-5	153.8	ND	5.0		ND	31	
n-Heptane	142-82-5	100.2	ND	5.0		ND	20	
1,2-Dichloroethane	107-06-2	98.96	ND	5.0		ND	20	
Benzene	71-43-2	78.11	ND	5.0		ND	16	
Trichloroethene	79-01-6	131.4	ND	5.0		ND	27	
1,2-Dichloropropane	78-87-5	113.0	ND	5.0		ND	23	
Methyl Methacrylate	80-62-6	100.1	ND	5.0		ND	20	
Bromodichloromethane	75-27-4	163.8	ND	5.0		ND	33	
1,4-Dioxane	123-91-1	88.11	ND	5.0		ND	18	

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Manchester, CT 06040

Phone: 860-646-2469
Email: dlafrance@fando.com

EMSL ORDER ID: 492100661
EMSL CUSTOMER ID: ENVI54
EMSL SAMPLE ID: 492100661-0003
CUSTOMER SAMPLE ID: 1609211101-03

Customer PO: 20081266.B20
EMSL Project ID:
Project Name: Needham Crumb Rubber -- 20081266.B20

Collected: 11/01/2021 11:15
Received: 11/02/2021 09:40
Analyzed: See Results
Reported: 12/13/2021

Analysis Initial	Analysis Date	Analyst Init.	Lab File ID	Canister ID	Sample Vol.	Dil. Factor
	11/16/2021	KW	y05122.D	JARL5	25 cc	10

Target Compound Results Summary

Target Compounds	CAS#	MW	Result ppbv	RL ppbv	Q	Result ug/m3	RL ug/m3	Comments
4-Methyl-2-pentanone(MIBK)	108-10-1	100.2	15	5.0		60	20	
cis-1,3-Dichloropropene	10061-01-5	111.0	ND	5.0		ND	23	
Toluene	108-88-3	92.14	ND	5.0		ND	19	
trans-1,3-Dichloropropene	10061-02-6	111.0	ND	5.0		ND	23	
1,1,2-Trichloroethane	79-00-5	133.4	ND	5.0		ND	27	
2-Hexanone(MBK)	591-78-6	100.2	ND	5.0		ND	20	
Tetrachloroethene	127-18-4	165.8	ND	5.0		ND	34	
Dibromochloromethane	124-48-1	208.3	ND	5.0		ND	43	
1,2-Dibromoethane	106-93-4	187.9	ND	5.0		ND	38	
Chlorobenzene	108-90-7	112.6	ND	5.0		ND	23	
Ethylbenzene	100-41-4	106.2	ND	5.0		ND	22	
Xylene (p,m)	1330-20-7	106.2	ND	10		ND	43	
Xylene (Ortho)	95-47-6	106.2	ND	5.0		ND	22	
Styrene	100-42-5	104.1	ND	5.0		ND	21	
Isopropylbenzene (cumene)	98-82-8	120.2	ND	5.0		ND	25	
Bromoform	75-25-2	252.7	ND	5.0		ND	52	
1,1,2,2-Tetrachloroethane	79-34-5	167.9	ND	5.0		ND	34	
4-Ethyltoluene	622-96-8	120.2	ND	5.0		ND	25	
1,3,5-Trimethylbenzene	108-67-8	120.2	ND	5.0		ND	25	
2-Chlorotoluene	95-49-8	126.6	ND	5.0		ND	26	
1,2,4-Trimethylbenzene	95-63-6	120.2	ND	5.0		ND	25	
1,3-Dichlorobenzene	541-73-1	147.0	ND	5.0		ND	30	
1,4-Dichlorobenzene	106-46-7	147.0	ND	5.0		ND	30	
Benzyl chloride	100-44-7	126.6	ND	5.0		ND	26	
1,2-Dichlorobenzene	95-50-1	147.0	ND	5.0		ND	30	
1,2,4-Trichlorobenzene	120-82-1	181.4	ND	5.0		ND	37	
Hexachloro-1,3-butadiene	87-68-3	260.8	ND	5.0		ND	53	
Naphthalene	91-20-3	128.2	ND	5.0		ND	26	
Total Target Compound Concentrations:			140	ppbv		370	ug/m3	

Surrogate

4-Bromofluorobenzene

Result

9.0

Spike

10

Recovery

90%

Qualifier Definitions**ND = Non Detect**

B = Compound also found in method blank.

E= Estimated concentration exceeding upper calibration range.

D= Result reported from diluted analysis.

J= Concentration estimated between Reporting Limit and MDL.

Method Reference

USEPA: Compendium Method TO-15, "Determination of Volatile Organic Compounds (VOCs) in Air..." Collected in Specially-Prepared Canisters and Analyzed by Gas Chromatography/Mass Spectrometry (GC/MS), January 1999, (EPA/625/R-96/010b).

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EMSL ORDER ID: 492100661

EMSL CUSTOMER ID: ENVI54

EMSL SAMPLE ID: 492100661-0003

CUSTOMER SAMPLE ID: 1609211101-03

Attention: Dan LaFrance
Fuss & O'Neill, Inc.
146 Hartford Road
Manchester, CT 06040

Customer PO: 20081266.B20
EMSL Project ID:
Project Name: Needham Crumb Rubber -- 20081266.B20

Phone: 860-646-2469
Email: dlafrance@fando.com

Collected: 11/01/2021 11:15
Received: 11/02/2021 09:40
Analyzed: See Results
Reported: 12/13/2021

Analysis Initial	Analysis Date	Analyst Init.	Lab File ID	Canister ID	Sample Vol.	Dil. Factor
	11/16/2021	KW	y05122.D	JARL5	25 cc	10

Tentatively Identified Compound Results Summary

[illegible]

Qualifier Definitions

(1) = If unknown, MW is assigned as equivalent Toluene (92) for ug/m3 conversion purposes.

B = Compound also found in method blank.

J= Estimated value based on a 1:1 response to internal standard.

N= Presumptive evidence of compound based on library match.

Method Reference

USEPA: Compendium Method TO-15, "Determination of Volatile Organic Compounds (VOCs) in Air..." Collected in Specially-Prepared Canisters and Analyzed by Gas Chromatography/Mass Spectrometry (GC/MS), January 1999, (EPA/625/R-96/010b).

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Phone: 860-646-2469
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EMSL ORDER ID: 492100661
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EMSL SAMPLE ID: 492100661-0003
CUSTOMER SAMPLE ID: 1609211101-03

Customer PO: 20081266.B20
EMSL Project ID:
Project Name: Needham Crumb Rubber -- 20081266.B20

Collected: 11/01/2021 11:15
Received: 11/02/2021 09:40
Analyzed: See Results
Reported: 12/13/2021

Analysis Initial	Analysis Date	Analyst Init.	Lab File ID	Canister ID	Sample Vol.	Dil. Factor
	11/16/2021	KW	y05122.D	JARL5	25 cc	10

Total Volatile Organic Compounds (TVOC) Summary

Target Compounds	CAS#	MW	Result ppbv	RL ppbv	Q	Result ug/m3	RL ug/m3	Comments
Acetone	67-64-1	58.08	110	5.0		260	12	
Tertiary butyl alcohol(TBA)	75-65-0	74.12	10	5.0		30	15	
Methylene chloride	75-09-2	84.93	5.5	5.0		19	17	
4-Methyl-2-pentanone(MIBK)	108-10-1	100.2	15	5.0		60	20	
Total Target Compound Concentrations:			140	ppbv		370	ug/m3	

Qualifier Definitions

B = Compound also found in method blank.
E = Estimated concentration exceeding upper calibration range.
D = Result reported from diluted analysis.
J = Concentration estimated between Reporting Limit and MDL.

Tentatively Identified Compounds	CAS#	MW(1)	Result ppbv		Q	Result ug/m3	Retention Time	Comments
Carbonyl sulfide	000463-58-1	60	23		JN	56	5.388	
1-Propene, 2-methyl-	000115-11-7	56	27		JN	63	6.2	
Total TIC Concentrations:			50	ppbv		120	ug/m3	

Qualifier Definitions

(1) = If unknown, MW is assigned as equivalent Toluene (92) for ug/m3 conversion purposes.
B = Compound also found in method blank.
J = Estimated value based on a 1:1 response to internal standard.
N = Presumptive evidence of compound based on library match.

Total Volatile Organic Compounds (TVOCs): 190 ppbv 490 ug/m3

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EMSL ORDER ID: 492100661
EMSL CUSTOMER ID: ENVI54
EMSL SAMPLE ID: 492100661-BCKG
CUSTOMER SAMPLE ID: Lab Background

Attention: Dan LaFrance
Fuss & O'Neill, Inc.
146 Hartford Road
Manchester, CT 06040

Customer PO: 20081266.B20
EMSL Project ID:
Project Name: Needham Crumb Rubber -- 20081266.B20

Phone: 860-646-2469
Email: dlafrance@fando.com

Collected:
Received: 11/02/2021 09:40
Analyzed: See Results
Reported: 11/16/2021

Analysis Initial	Analysis Date	Analyst Init.	Lab File ID	Canister ID	Sample Vol.	Dil. Factor
	11/16/2021	KW	y05119.D	JARL6	25 cc	10

Target Compound Results Summary

Target Compounds	CAS#	MW	Result ppbv	RL ppbv	Q	Result ug/m3	RL ug/m3	Comments
Propylene	115-07-1	42.08	ND	10		ND	17	
Freon 12(Dichlorodifluoromethane)	75-71-8	120.9	ND	5.0		ND	25	
Freon 114(1,2-Dichlorotetrafluoroethane)	76-14-2	170.9	ND	5.0		ND	35	
Chloromethane	74-87-3	50.49	ND	5.0		ND	10	
n-Butane	106-97-8	58.12	ND	5.0		ND	12	
Vinyl chloride	75-01-4	62.50	ND	5.0		ND	13	
1,3-Butadiene	106-99-0	54.09	ND	5.0		ND	11	
Bromomethane	74-83-9	94.94	ND	5.0		ND	19	
Chloroethane	75-00-3	64.51	ND	5.0		ND	13	
Ethanol	64-17-5	46.07	100	5.0		190	9.4	
Bromoethene(Vinyl bromide)	593-60-2	106.9	ND	5.0		ND	22	
Freon 11(Trichlorofluoromethane)	75-69-4	137.4	ND	5.0		ND	28	
Isopropyl alcohol(2-Propanol)	67-63-0	60.09	34	5.0		84	12	
Freon 113(1,1,2-Trichlorotrifluoroethane)	76-13-1	187.4	ND	5.0		ND	38	
Acetone	67-64-1	58.08	8.5	5.0		20	12	
1,1-Dichloroethene	75-35-4	96.94	ND	5.0		ND	20	
Acetonitrile	75-05-8	41.05	ND	5.0		ND	8.4	
Tertiary butyl alcohol(TBA)	75-65-0	74.12	ND	5.0		ND	15	
Bromoethane(Ethyl bromide)	74-96-4	109.0	ND	5.0		ND	22	
3-Chloropropene(Allyl chloride)	107-05-1	76.52	ND	5.0		ND	16	
Carbon disulfide	75-15-0	76.14	ND	5.0		ND	16	
Methylene chloride	75-09-2	84.93	ND	5.0		ND	17	
Acrylonitrile	107-13-1	53.08	ND	5.0		ND	11	
Methyl-tert-butyl ether(MTBE)	1634-04-4	88.15	ND	5.0		ND	18	
trans-1,2-Dichloroethene	156-60-5	96.94	ND	5.0		ND	20	
n-Hexane	110-54-3	86.18	ND	5.0		ND	18	
1,1-Dichloroethane	75-34-3	98.96	ND	5.0		ND	20	
Vinyl acetate	108-05-4	86.09	ND	5.0		ND	18	
2-Butanone(MEK)	78-93-3	72.11	ND	5.0		ND	15	
cis-1,2-Dichloroethene	156-59-2	96.94	ND	5.0		ND	20	
Ethyl acetate	141-78-6	88.11	ND	5.0		ND	18	
Chloroform	67-66-3	119.4	ND	5.0		ND	24	
Tetrahydrofuran	109-99-9	72.11	ND	5.0		ND	15	
1,1,1-Trichloroethane	71-55-6	133.4	ND	5.0		ND	27	
Cyclohexane	110-82-7	84.16	ND	5.0		ND	17	
2,2,4-Trimethylpentane(Isooctane)	540-84-1	114.2	ND	5.0		ND	23	
Carbon tetrachloride	56-23-5	153.8	ND	5.0		ND	31	
n-Heptane	142-82-5	100.2	ND	5.0		ND	20	
1,2-Dichloroethane	107-06-2	98.96	ND	5.0		ND	20	
Benzene	71-43-2	78.11	ND	5.0		ND	16	
Trichloroethene	79-01-6	131.4	ND	5.0		ND	27	
1,2-Dichloropropane	78-87-5	113.0	ND	5.0		ND	23	
Methyl Methacrylate	80-62-6	100.1	ND	5.0		ND	20	
Bromodichloromethane	75-27-4	163.8	ND	5.0		ND	33	
1,4-Dioxane	123-91-1	88.11	ND	5.0		ND	18	

16 of 20

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EMSL ORDER ID: 492100661
EMSL CUSTOMER ID: ENVI54
EMSL SAMPLE ID: 492100661-BCKG
CUSTOMER SAMPLE ID: Lab Background

Customer PO: 20081266.B20
EMSL Project ID:
Project Name: Needham Crumb Rubber -- 20081266.B20

Collected:
Received: 11/02/2021 09:40
Analyzed: See Results
Reported: 11/16/2021

Analysis Initial	Analysis Date	Analyst Init.	Lab File ID	Canister ID	Sample Vol.	Dil. Factor
	11/16/2021	KW	y05119.D	JARL6	25 cc	10

Target Compound Results Summary

Target Compounds	CAS#	MW	Result ppbv	RL ppbv	Q	Result ug/m3	RL ug/m3	Comments
4-Methyl-2-pentanone(MIBK)	108-10-1	100.2	ND	5.0		ND	20	
cis-1,3-Dichloropropene	10061-01-5	111.0	ND	5.0		ND	23	
Toluene	108-88-3	92.14	ND	5.0		ND	19	
trans-1,3-Dichloropropene	10061-02-6	111.0	ND	5.0		ND	23	
1,1,2-Trichloroethane	79-00-5	133.4	ND	5.0		ND	27	
2-Hexanone(MBK)	591-78-6	100.2	ND	5.0		ND	20	
Tetrachloroethene	127-18-4	165.8	ND	5.0		ND	34	
Dibromochloromethane	124-48-1	208.3	ND	5.0		ND	43	
1,2-Dibromoethane	106-93-4	187.9	ND	5.0		ND	38	
Chlorobenzene	108-90-7	112.6	ND	5.0		ND	23	
Ethylbenzene	100-41-4	106.2	ND	5.0		ND	22	
Xylene (p,m)	1330-20-7	106.2	ND	10		ND	43	
Xylene (Ortho)	95-47-6	106.2	ND	5.0		ND	22	
Styrene	100-42-5	104.1	ND	5.0		ND	21	
Isopropylbenzene (cumene)	98-82-8	120.2	ND	5.0		ND	25	
Bromoform	75-25-2	252.7	ND	5.0		ND	52	
1,1,2,2-Tetrachloroethane	79-34-5	167.9	ND	5.0		ND	34	
4-Ethyltoluene	622-96-8	120.2	ND	5.0		ND	25	
1,3,5-Trimethylbenzene	108-67-8	120.2	ND	5.0		ND	25	
2-Chlorotoluene	95-49-8	126.6	ND	5.0		ND	26	
1,2,4-Trimethylbenzene	95-63-6	120.2	ND	5.0		ND	25	
1,3-Dichlorobenzene	541-73-1	147.0	ND	5.0		ND	30	
1,4-Dichlorobenzene	106-46-7	147.0	ND	5.0		ND	30	
Benzyl chloride	100-44-7	126.6	ND	5.0		ND	26	
1,2-Dichlorobenzene	95-50-1	147.0	ND	5.0		ND	30	
1,2,4-Trichlorobenzene	120-82-1	181.4	ND	5.0		ND	37	
Hexachloro-1,3-butadiene	87-68-3	260.8	ND	5.0		ND	53	
Naphthalene	91-20-3	128.2	ND	5.0		ND	26	
Total Target Compound Concentrations:			140	ppbv		290	ug/m3	

Surrogate

4-Bromofluorobenzene

Result

8.8

Spike

10

Recovery

88%

Qualifier Definitions**ND = Non Detect**

B = Compound also found in method blank.

E= Estimated concentration exceeding upper calibration range.

D= Result reported from diluted analysis.

J= Concentration estimated between Reporting Limit and MDL.

Method Reference

USEPA: Compendium Method TO-15, "Determination of Volatile Organic Compounds (VOCs) in Air..." Collected in Specially-Prepared Canisters and Analyzed by Gas Chromatography/Mass Spectrometry (GC/MS), January 1999, (EPA/625/R-96/010b).

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200 Route 130 North
Cinnaminson, NJ 08077
Telephone: (856)858-4800 FAX: (856)858-4571
to15lab@EMSL.com | <http://www.EMSL.com>

EMSL ORDER ID: 492100661

EMSL CUSTOMER ID: ENVI54

EMSL SAMPLE ID: 492100661-BCKG

CUSTOMER SAMPLE ID: Lab Background

Attention: Dan LaFrance
Fuss & O'Neill, Inc.
146 Hartford Road
Manchester, CT 06040

Customer PO: 20081266.B20
EMSL Project ID:
Project Name: Needham Crumb Rubber -- 20081266.B20

Phone: 860-646-2469
Email: dlafrance@fando.com

Collected:
Received: 11/02/2021 09:40
Analyzed: See Results
Reported: 11/16/2021

Analysis Initial	Analysis Date	Analyst Init.	Lab File ID	Canister ID	Sample Vol.	Dil. Factor
	11/16/2021	KW	y05119.D	JARL6	25 cc	10

Tentatively Identified Compound Results Summary

[illegible]

Qualifier Definitions

(1) = If unknown, MW is assigned as equivalent Toluene (92) for ug/m3 conversion purposes.

B = Compound also found in method blank.

J= Estimated value based on a 1:1 response to internal standard.

N= Presumptive evidence of compound based on library match.

Method Reference

USEPA: Compendium Method TO-15, "Determination of Volatile Organic Compounds (VOCs) in Air..." Collected in Specially-Prepared Canisters and Analyzed by Gas Chromatography/Mass Spectrometry (GC/MS), January 1999, (EPA/625/R-96/010b).

**EMSL ANALYTICAL, INC.**

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Collected:
Received: 11/02/2021 09:40
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Reported: 11/16/2021

Analysis Initial	Analysis Date	Analyst Init.	Lab File ID	Canister ID	Sample Vol.	Dil. Factor
	11/16/2021	KW	y05119.D	JARL6	25 cc	10

Total Volatile Organic Compounds (TVOC) Summary

Target Compounds	CAS#	MW	Result ppbv	RL ppbv	Q	Result ug/m3	RL ug/m3	Comments
Ethanol	64-17-5	46.07	100	5.0		190	9.4	
Isopropyl alcohol(2-Propanol)	67-63-0	60.09	34	5.0		84	12	
Acetone	67-64-1	58.08	8.5	5.0		20	12	
Total Target Compound Concentrations:			140	ppbv		290	ug/m3	

Qualifier Definitions

B = Compound also found in method blank.
E= Estimated concentration exceeding upper calibration range.
D= Result reported from diluted analysis.
J= Concentration estimated between Reporting Limit and MDL.

Tentatively Identified Compounds	CAS#	MW(1)	Result ppbv		Q	Result ug/m3	Retention Time	Comments
Total TIC Concentrations:			0.0	ppbv		0.0	ug/m3	

Qualifier Definitions

(1) = If unknown, MW is assigned as equivalent Toluene (92) for ug/m3 conversion purposes.
B = Compound also found in method blank.
J= Estimated value based on a 1:1 response to internal standard.
N= Presumptive evidence of compound based on library match.

Total Volatile Organic Compounds (TVOCs): 140 ppbv 290 ug/m3



FUSS & O'NEILL

(860) 646-2469 • www.FandO.com

- ☐ 146 Hartford Road, Manchester, CT 06040
☐ 56 Quarry Road, Trumbull, CT 06611
☐ 1419 Richland Street, Columbia, SC 29201

- ☐ 78 Interstate Drive, West Springfield, MA 01089
☒ 108 Myrtle Street, #502, North Quincy, MA 02171
☐ 317 Iron Horse Way, Suite 204, Providence, RI 02908

- ☐ 80 Washington Street, Suite 301, Poughkeepsie, NY

CHAIN-OF-CUSTODY RECORD

41779

PROJECT NAME

PROJECT LOCATION

PROJECT NUMBER

LABORATORY

Needham Crumb Rubber Needham, MA

20081266.B20

EMSL (NJ)

REPORT TO: Daniel Lafrance (dlafrance@fandO.com)

INVOICE TO: "

Analysis Request

Containers

P.O. No.: 160920081266.B20

Sampler's Signature: *Alamy* Date: 11/01/21

Source Codes: MW=Monitoring Well PW=Potable Water T=Treatment Facility S=Soil B=Sediment
SW=Surface Water ST=Stormwater W=Waste A=Air C=Concrete

X=Other Crumb rubber

Item No.	Transfer Check				Sample Number	Source Code	Date Sampled	Time Sampled
	1	2	3	4				
1	X				1609211101-01	X	11/01/21	11:45
2	X				1609211101-02	X	11/01/21	16:50
3	X				1609211101-03	X	11/01/21	11:15

Full VOC list by TO-15 and TICs	X	X	X	X	3	Soil VOC Vial □ methanol	Other	Water VOA Vial □ As is □ HCl	Glass Amber () ml □ As is □ H ₂ SO ₄	Plastic - As is, □ 250 ml □ 500 ml □ 1000 ml	Plastic - H ₂ SO ₄ □ 250 ml □ 500 ml	Plastic - HNO ₃ □ 250 ml □ 500 ml	Plastic - NaOH, 250 ml □ 500 ml □ 1000 ml	Comments
Full SVOC list by 870 and 625	X	X	X	X	3	Soil VOC Vial □ water	Other	Water VOA Vial □ As is □ HCl	Glass Amber () ml □ As is □ H ₂ SO ₄	Plastic - As is, □ 250 ml □ 500 ml	Plastic - H ₂ SO ₄ □ 250 ml □ 500 ml	Plastic - HNO ₃ □ 250 ml □ 500 ml	Plastic - NaOH, 250 ml □ 500 ml □ 1000 ml	Comments
Metals (As, Cd, Cr, Pb, Fe, Mn, Hg, Se, Zn) by 6010/7470	X	X	X	X	3	Soil VOC Vial □ water	Other	Water VOA Vial □ As is □ HCl	Glass Amber () ml □ As is □ H ₂ SO ₄	Plastic - As is, □ 250 ml □ 500 ml	Plastic - H ₂ SO ₄ □ 250 ml □ 500 ml	Plastic - HNO ₃ □ 250 ml □ 500 ml	Plastic - NaOH, 250 ml □ 500 ml □ 1000 ml	Comments
Full VOC list by TO-15 and TICs	X	X	X	X	3	Soil VOC Vial □ water	Other	Water VOA Vial □ As is □ HCl	Glass Amber () ml □ As is □ H ₂ SO ₄	Plastic - As is, □ 250 ml □ 500 ml	Plastic - H ₂ SO ₄ □ 250 ml □ 500 ml	Plastic - HNO ₃ □ 250 ml □ 500 ml	Plastic - NaOH, 250 ml □ 500 ml □ 1000 ml	Comments
Full SVOC list by 870 and 625	X	X	X	X	3	Soil VOC Vial □ water	Other	Water VOA Vial □ As is □ HCl	Glass Amber () ml □ As is □ H ₂ SO ₄	Plastic - As is, □ 250 ml □ 500 ml	Plastic - H ₂ SO ₄ □ 250 ml □ 500 ml	Plastic - HNO ₃ □ 250 ml □ 500 ml	Plastic - NaOH, 250 ml □ 500 ml □ 1000 ml	Comments
Metals (As, Cd, Cr, Pb, Fe, Mn, Hg, Se, Zn) by 6010/7470	X	X	X	X	3	Soil VOC Vial □ water	Other	Water VOA Vial □ As is □ HCl	Glass Amber () ml □ As is □ H ₂ SO ₄	Plastic - As is, □ 250 ml □ 500 ml	Plastic - H ₂ SO ₄ □ 250 ml □ 500 ml	Plastic - HNO ₃ □ 250 ml □ 500 ml	Plastic - NaOH, 250 ml □ 500 ml □ 1000 ml	Comments

95-1 HJ 2-AUN12

Transfer Number	Relinquished By	Accepted By	Date	Time	Charge Exceptions: □ CT Tax Exempt □ QA/QC □ Other
1	<i>Alamy</i>	<i>Colleen Palladino</i>	11/01/21	12:35	Duplicates (Item Nos.)
2			11/01/21	9:40AM	Reporting and Detection Limit Requirements: □ RCP Deliverables □ MCP CAM Cert.
3		<i>Alamy</i>	11/01/21	08:11	
4					

Additional Comments:

Run for same parameter list as rec'd previously in reports
012005392 and 441200386 (20081266.B20)

381



EMSL Analytical, Inc.

200 Route 130 North, Cinnaminson, NJ 08077

Phone: (856) 303-2500 Fax: (856) 858-4571 Email: EnvChemistry2@emsl.com

Attn:

**Dan LaFrance
Fuss & O'Neill, Inc.
146 Hartford Road
Manchester, CT 06040**

Phone: (860) 646-2469

Fax:

12/9/2021

The following analytical report covers the analysis performed on samples submitted to EMSL Analytical, Inc. on 11/2/2021. The results are tabulated on the attached data pages for the following client designated project:

Needham Crumb Rubber Needham, MA 20081266.B20

The reference number for these samples is EMSL Order #012112502. Please use this reference when calling about these samples. If you have any questions, please do not hesitate to contact me at (856) 303-2500.

Approved By:

Phillip Worby, Environmental Chemistry
Laboratory Director



The test results contained within this report meet the requirements of NELAP and/or the specific certification program that is applicable, unless otherwise noted.
NELAP Certifications: NJ 03036, NY 10872, PA 68-00367, CA ELAP 1877

The MS/MSD surrogate recoveries for Hexachlorocyclopentadiene and Benzidine fell outside control limits low. All other QC results met criteria.

Report amended 12/02/2021 12:09:28 Replaces initial report from 11/30/2021 17:41:14

The samples associated with this report were received in good condition unless otherwise noted. This report relates only to those items tested as received by the laboratory. The QC data associated with the sample results meet the recovery and precision requirements established by the NELAP, unless specifically indicated. All results for soil samples are reported on a dry weight basis, unless otherwise noted. This report may not be reproduced except in full and without written approval by EMSL Analytical, Inc.

**EMSL Analytical, Inc.**

200 Route 130 North, Cinnaminson, NJ 08077

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<http://www.EMSL.com>EnvChemistry2@emsl.com

EMSL Order: 012112502

CustomerID: ENVI54

CustomerPO:

ProjectID:

Attn: **Dan LaFrance**
Fuss & O'Neill, Inc.
146 Hartford Road
Manchester, CT 06040

Phone: (860) 646-2469
 Fax:
 Received: 11/2/2021 09:40 AM

Project: **Needham Crumb Rubber Needham, MA 20081266.B20****Analytical Results****Client Sample Description** 1609211101-01**Collected:** 11/1/2021
9:45:00 AM**Lab ID:** 012112502-0001

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
GCMS-SVOA					
3546/8270D	1,2,4-Trichlorobenzene	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	1,2-Dichlorobenzene	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	1,2-Diphenylhydrazine (as azobenzene)	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	1,3-Dichlorobenzene	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	1,4-Dichlorobenzene	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2,4,5-Trichlorophenol	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2,4,6-Trichlorophenol	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2,4-Dichlorophenol	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2,4-Dinitrotoluene	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2,6-Dichlorophenol	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2,6-Dinitrotoluene	ND D	24000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2-Chloronaphthalene	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2-Chlorophenol	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2-Methylnaphthalene	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2-Methylphenol	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2-Nitroaniline	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2-Nitrophenol	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	3,3'-Dichlorobenzidine	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	3-Nitroaniline	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	4,6-Dinitro-2-methylphenol	ND D	24000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	4-Bromophenyl-phenylether	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC

**EMSL Analytical, Inc.**

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EMSL Order: 012112502

CustomerID: ENVI54

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ProjectID:

Attn: **Dan LaFrance**
Fuss & O'Neill, Inc.
146 Hartford Road
Manchester, CT 06040

Phone: (860) 646-2469

Fax:

Received: 11/2/2021 09:40 AM

Project: **Needham Crumb Rubber Needham, MA 20081266.B20****Analytical Results****Client Sample Description** 1609211101-01**Collected:** 11/1/2021
9:45:00 AM**Lab ID:** 012112502-0001

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
GCMS-SVOA					
3546/8270D	4-Chloro-3-methylphenol	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	4-Chloroaniline	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	4-Chlorophenyl-phenylether	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	3&4-Methylphenol	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	4-Nitroaniline	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	4-Nitrophenol	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Acenaphthene	ND D	1200 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Acenaphthylene	ND D	1200 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Aniline	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Anthracene	ND D	1200 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzidine	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzo(a)anthracene	ND D	1200 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzo(a)pyrene	ND D	1200 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzo(b)fluoranthene	ND D	1200 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzo(g,h,i)perylene	ND D	1200 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzo(k)fluoranthene	ND D	1200 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzoic Acid	ND D	24000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzyl Alcohol	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Bis(2-chloroethoxy)methane	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Bis(2-chloroethyl)ether	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Bis(2-chloroisopropyl)ether	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00

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Project: **Needham Crumb Rubber Needham, MA 20081266.B20****Analytical Results****Client Sample Description** 1609211101-01**Collected:** 11/1/2021
9:45:00 AM**Lab ID:** 012112502-0001

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
GCMS-SVOA					
3546/8270D	Bis(2-ethylhexyl)phthalate	ND D	37000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Butylbenzylphthalate	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Carbazole	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Chrysene	2100 D	1200 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Di-n-butylphthalate	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Di-n-octylphthalate	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Dibenz(a,h)anthracene	ND D	1200 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Dibenzofuran	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Diethylphthalate	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Dimethylphthalate	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Fluoranthene	3800 D	1200 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Fluorene	ND D	1200 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Hexachlorobenzene	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Hexachlorobutadiene	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Hexachlorocyclopentadiene	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Hexachloroethane	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Indeno(1,2,3-cd)pyrene	ND D	1200 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Isophorone	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	N-Nitroso-di-n-propylamine	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	N-Nitrosodimethylamine	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	N-Nitrosodiphenylamine	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00

**EMSL Analytical, Inc.**

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EMSL Order: 012112502

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Attn: **Dan LaFrance**
Fuss & O'Neill, Inc.
146 Hartford Road
Manchester, CT 06040

Phone: (860) 646-2469
 Fax:
 Received: 11/2/2021 09:40 AM

Project: **Needham Crumb Rubber Needham, MA 20081266.B20****Analytical Results**

Client Sample Description 1609211101-01 **Collected:** 11/1/2021 9:45:00 AM **Lab ID:** 012112502-0001

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
GCMS-SVOA					
3546/8270D	Naphthalene	ND D	1200 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	Nitrobenzene	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	Pentachlorophenol	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	Phenanthrene	ND D	1200 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	Phenol	ND D	12000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	Pyrene	9600 D	1200 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC

SUBCONTRACT

Subcontract-Pace Analytical Services	See Attached	N/A
--------------------------------------	--------------	-----

Client Sample Description 1609211101-02 **Collected:** 11/1/2021 10:30:00 AM **Lab ID:** 012112502-0002

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
GCMS-SVOA					
3546/8270D	1,2,4-Trichlorobenzene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	1,2-Dichlorobenzene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	1,2-Diphenylhydrazine (as azobenzene)	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	1,3-Dichlorobenzene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	1,4-Dichlorobenzene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2,4,5-Trichlorophenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2,4,6-Trichlorophenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2,4-Dichlorophenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2,4-Dinitrotoluene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC

**EMSL Analytical, Inc.**

200 Route 130 North, Cinnaminson, NJ 08077

Phone/Fax: (856) 303-2500 / (856) 858-4571

<http://www.EMSL.com>EnvChemistry2@emsl.com

EMSL Order: 012112502

CustomerID: ENVI54

CustomerPO:

ProjectID:

Attn: **Dan LaFrance**
Fuss & O'Neill, Inc.
146 Hartford Road
Manchester, CT 06040

Phone: (860) 646-2469

Fax:

Received: 11/2/2021 09:40 AM

Project: **Needham Crumb Rubber Needham, MA 20081266.B20****Analytical Results****Client Sample Description** 1609211101-02**Collected:** 11/1/2021**Lab ID:** 012112502-0002

10:30:00 AM

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
GCMS-SVOA					
3546/8270D	2,6-Dichlorophenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	2,6-Dinitrotoluene	ND D	22000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	2-Chloronaphthalene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	2-Chlorophenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	2-Methylnaphthalene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	2-Methylphenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	2-Nitroaniline	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	2-Nitrophenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	3,3'-Dichlorobenzidine	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	3-Nitroaniline	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	4,6-Dinitro-2-methylphenol	ND D	22000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	4-Bromophenyl-phenylether	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	4-Chloro-3-methylphenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	4-Chloroaniline	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	4-Chlorophenyl-phenylether	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	3&4-Methylphenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	4-Nitroaniline	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	4-Nitrophenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Acenaphthene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Acenaphthylene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Aniline	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00

**EMSL Analytical, Inc.**

200 Route 130 North, Cinnaminson, NJ 08077

Phone/Fax: (856) 303-2500 / (856) 858-4571

<http://www.EMSL.com>EnvChemistry2@emsl.com

EMSL Order: 012112502

CustomerID: ENVI54

CustomerPO:

ProjectID:

Attn: **Dan LaFrance**
Fuss & O'Neill, Inc.
146 Hartford Road
Manchester, CT 06040

Phone: (860) 646-2469

Fax:

Received: 11/2/2021 09:40 AM

Project: **Needham Crumb Rubber Needham, MA 20081266.B20****Analytical Results****Client Sample Description** 1609211101-02**Collected:** 11/1/2021
10:30:00 AM**Lab ID:** 012112502-0002

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
GCMS-SVOA					
3546/8270D	Anthracene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzidine	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzo(a)anthracene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzo(a)pyrene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzo(b)fluoranthene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzo(g,h,i)perylene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzo(k)fluoranthene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzoic Acid	ND D	22000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzyl Alcohol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Bis(2-chloroethoxy)methane	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Bis(2-chloroethyl)ether	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Bis(2-chloroisopropyl)ether	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Bis(2-ethylhexyl)phthalate	ND D	33000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Butylbenzylphthalate	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Carbazole	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Chrysene	2500 D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Di-n-butylphthalate	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Di-n-octylphthalate	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Dibenz(a,h)anthracene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Dibenzofuran	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Diethylphthalate	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00

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EMSL Order: 012112502

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Phone: (860) 646-2469

Fax:

Received: 11/2/2021 09:40 AM

Project: **Needham Crumb Rubber Needham, MA 20081266.B20****Analytical Results****Client Sample Description** 1609211101-02**Collected:** 11/1/2021**Lab ID:** 012112502-0002

10:30:00 AM

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
GCMS-SVOA					
3546/8270D	Dimethylphthalate	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Fluoranthene	3400 D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Fluorene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Hexachlorobenzene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Hexachlorobutadiene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Hexachlorocyclopentadiene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Hexachloroethane	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Indeno(1,2,3-cd)pyrene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Isophorone	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	N-Nitroso-di-n-propylamine	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	N-Nitrosodimethylamine	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	N-Nitrosodiphenylamine	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Naphthalene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Nitrobenzene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Pentachlorophenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Phenanthrene	1200 D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Phenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Pyrene	9000 D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
SUBCONTRACT					
Subcontract-Pace Analytical Services	See Attached		N/A		

**EMSL Analytical, Inc.**

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Phone/Fax: (856) 303-2500 / (856) 858-4571

<http://www.EMSL.com>EnvChemistry2@emsl.com

EMSL Order: 012112502

CustomerID: ENVI54

CustomerPO:

ProjectID:

Attn: **Dan LaFrance**
Fuss & O'Neill, Inc.
146 Hartford Road
Manchester, CT 06040

Phone: (860) 646-2469
 Fax:
 Received: 11/2/2021 09:40 AM

Project: **Needham Crumb Rubber Needham, MA 20081266.B20****Analytical Results****Client Sample Description** 1609211101-03**Collected:** 11/1/2021
11:15:00 AM**Lab ID:** 012112502-0003

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
GCMS-SVOA					
3546/8270D	1,2,4-Trichlorobenzene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	1,2-Dichlorobenzene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	1,2-Diphenylhydrazine (as azobenzene)	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	1,3-Dichlorobenzene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	1,4-Dichlorobenzene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2,4,5-Trichlorophenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2,4,6-Trichlorophenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2,4-Dichlorophenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2,4-Dinitrotoluene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2,6-Dichlorophenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2,6-Dinitrotoluene	ND D	22000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2-Chloronaphthalene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2-Chlorophenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2-Methylnaphthalene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2-Methylphenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2-Nitroaniline	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	2-Nitrophenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	3,3'-Dichlorobenzidine	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	3-Nitroaniline	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	4,6-Dinitro-2-methylphenol	ND D	22000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC
3546/8270D	4-Bromophenyl-phenylether	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 00:00 AC

**EMSL Analytical, Inc.**

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EMSL Order: 012112502

CustomerID: ENVI54

CustomerPO:

ProjectID:

Attn: **Dan LaFrance**
Fuss & O'Neill, Inc.
146 Hartford Road
Manchester, CT 06040

Phone: (860) 646-2469
 Fax:
 Received: 11/2/2021 09:40 AM

Project: **Needham Crumb Rubber Needham, MA 20081266.B20****Analytical Results****Client Sample Description** 1609211101-03**Collected:** 11/1/2021
11:15:00 AM**Lab ID:** 012112502-0003

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
GCMS-SVOA					
3546/8270D	4-Chloro-3-methylphenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	4-Chloroaniline	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	4-Chlorophenyl-phenylether	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	3&4-Methylphenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	4-Nitroaniline	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	4-Nitrophenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Acenaphthene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Acenaphthylene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Aniline	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Anthracene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzidine	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzo(a)anthracene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzo(a)pyrene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzo(b)fluoranthene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzo(g,h,i)perylene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzo(k)fluoranthene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzoic Acid	ND D	22000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Benzyl Alcohol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Bis(2-chloroethoxy)methane	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Bis(2-chloroethyl)ether	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Bis(2-chloroisopropyl)ether	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00

**EMSL Analytical, Inc.**

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EMSL Order: 012112502

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Manchester, CT 06040

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Received: 11/2/2021 09:40 AM

Project: **Needham Crumb Rubber Needham, MA 20081266.B20****Analytical Results****Client Sample Description** 1609211101-03**Collected:** 11/1/2021**Lab ID:** 012112502-0003

11:15:00 AM

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
GCMS-SVOA					
3546/8270D	Bis(2-ethylhexyl)phthalate	ND D	33000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Butylbenzylphthalate	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Carbazole	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Chrysene	1600 D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Di-n-butylphthalate	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Di-n-octylphthalate	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Dibenz(a,h)anthracene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Dibenzofuran	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Diethylphthalate	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Dimethylphthalate	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Fluoranthene	3500 D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Fluorene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Hexachlorobenzene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Hexachlorobutadiene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Hexachlorocyclopentadiene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Hexachloroethane	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Indeno(1,2,3-cd)pyrene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Isophorone	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	N-Nitroso-di-n-propylamine	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	N-Nitrosodimethylamine	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	N-Nitrosodiphenylamine	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00

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Phone: (860) 646-2469
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 Received: 11/2/2021 09:40 AM

Project: **Needham Crumb Rubber Needham, MA 20081266.B20****Analytical Results****Client Sample Description** 1609211101-03**Collected:** 11/1/2021
11:15:00 AM**Lab ID:** 012112502-0003

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
GCMS-SVOA					
3546/8270D	Naphthalene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Nitrobenzene	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Pentachlorophenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Phenanthrene	ND D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Phenol	ND D	11000 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
3546/8270D	Pyrene	9000 D	1100 µg/Kg	11/5/2021 PG	11/15/2021 AC 00:00
SUBCONTRACT					
Subcontract-Pace Analytical Services	See Attached		N/A		

Definitions:

MDL - method detection limit

J - Result was below the reporting limit, but at or above the MDL

ND - indicates that the analyte was not detected at the reporting limit

RL - Reporting Limit (Analytical)

D - Dilution Sample required a dilution which was used to calculate final results

November 10, 2021

Debbie Kreider
EMSL Analytical, Inc., NJ
200 Route 130 North
Cinnaminson, NJ 08077

RE: Project: 012112502
Pace Project No.: 70193281

Dear Debbie Kreider:

Enclosed are the analytical results for sample(s) received by the laboratory on November 03, 2021. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - Melville

If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Savannah S. Benatar
savannah.benatar@pacelabs.com
(631)694-3040
Project Manager

Enclosures

cc: Travis Albert, EMSL Analytical, Inc., NJ



REPORT OF LABORATORY ANALYSIS

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CERTIFICATIONS

Project: 012112502

Pace Project No.: 70193281

Pace Analytical Services Long Island

575 Broad Hollow Rd, Melville, NY 11747

Connecticut Certification #: PH-0435

Delaware Certification # NY 10478

Maryland Certification #: 208

Massachusetts Certification #: M-NY026

New Hampshire Certification #: 2987

New Jersey Certification #: NY158

New York Certification #: 10478 Primary Accrediting Body

Pennsylvania Certification #: 68-00350

Rhode Island Certification #: LAO00340

Virginia Certification # 460302

REPORT OF LABORATORY ANALYSIS

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SAMPLE SUMMARY

Project: 012112502

Pace Project No.: 70193281

Lab ID	Sample ID	Matrix	Date Collected	Date Received
70193281001	012112502-0001	Solid	11/01/21 09:45	11/03/21 10:00
70193281002	012112502-0002	Solid	11/01/21 10:30	11/03/21 10:00
70193281003	012112502-0003	Solid	11/01/21 11:15	11/03/21 10:00

REPORT OF LABORATORY ANALYSIS

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SAMPLE ANALYTE COUNT

Project: 012112502

Pace Project No.: 70193281

Lab ID	Sample ID	Method	Analysts	Analytes Reported
70193281001	012112502-0001	EPA 6010D	HMH	8
		EPA 7471B	JJS	1
		ASTM D2216-05M	CEA	1
70193281002	012112502-0002	EPA 6010D	HMH	8
		EPA 7471B	JJS	1
		ASTM D2216-05M	CEA	1
70193281003	012112502-0003	EPA 6010D	HMH	8
		EPA 7471B	JJS	1
		ASTM D2216-05M	CEA	1

PACE-MV = Pace Analytical Services - Melville

REPORT OF LABORATORY ANALYSIS

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SUMMARY OF DETECTION

Project: 012112502

Pace Project No.: 70193281

Lab Sample ID	Client Sample ID					
Method	Parameters	Result	Units	Report Limit	Analyzed	Qualifiers
70193281001	012112502-0001					
EPA 6010D	Iron	732	mg/kg	26.8	11/10/21 15:35	
EPA 6010D	Lead	8.5	mg/kg	1.3	11/10/21 15:35	
EPA 6010D	Manganese	6.1	mg/kg	4.0	11/10/21 15:35	
EPA 6010D	Zinc	11300	mg/kg	5.4	11/10/21 15:35	
ASTM D2216-05M	Percent Moisture	9.7	%	0.10	11/04/21 16:01	
70193281002	012112502-0002					
EPA 6010D	Chromium	10.2	mg/kg	2.7	11/10/21 15:27	
EPA 6010D	Iron	722	mg/kg	27.5	11/10/21 15:27	
EPA 6010D	Lead	8.7	mg/kg	1.4	11/10/21 15:27	
EPA 6010D	Manganese	5.8	mg/kg	4.1	11/10/21 15:27	
EPA 6010D	Zinc	10400	mg/kg	5.5	11/10/21 15:27	
ASTM D2216-05M	Percent Moisture	10.2	%	0.10	11/04/21 16:01	
70193281003	012112502-0003					
EPA 6010D	Iron	342	mg/kg	24.4	11/10/21 15:29	
EPA 6010D	Lead	11.2	mg/kg	1.2	11/10/21 15:29	
EPA 6010D	Manganese	4.1	mg/kg	3.7	11/10/21 15:29	
EPA 6010D	Zinc	12200	mg/kg	4.9	11/10/21 15:29	
ASTM D2216-05M	Percent Moisture	3.1	%	0.10	11/04/21 16:02	

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ANALYTICAL RESULTS

Project: 012112502

Pace Project No.: 70193281

Sample: 012112502-0001 **Lab ID: 70193281001** Collected: 11/01/21 09:45 Received: 11/03/21 10:00 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report Limit	MDL	DF	Prepared	Analyzed	CAS No.	Qual
6010D MET ICP									
Analytical Method: EPA 6010D Preparation Method: EPA 3050B									
Pace Analytical Services - Melville									
Arsenic	<2.7	mg/kg	2.7	1.3	5	11/09/21 16:00	11/10/21 15:35	7440-38-2	
Cadmium	<0.67	mg/kg	0.67	0.076	5	11/09/21 16:00	11/10/21 15:35	7440-43-9	
Chromium	<2.7	mg/kg	2.7	1.1	5	11/09/21 16:00	11/10/21 15:35	7440-47-3	
Iron	732	mg/kg	26.8	4.5	5	11/09/21 16:00	11/10/21 15:35	7439-89-6	
Lead	8.5	mg/kg	1.3	0.69	5	11/09/21 16:00	11/10/21 15:35	7439-92-1	
Manganese	6.1	mg/kg	4.0	1.3	5	11/09/21 16:00	11/10/21 15:35	7439-96-5	
Selenium	<2.7	mg/kg	2.7	1.6	5	11/09/21 16:00	11/10/21 15:35	7782-49-2	
Zinc	11300	mg/kg	5.4	3.3	5	11/09/21 16:00	11/10/21 15:35	7440-66-6	
7471 Mercury									
Analytical Method: EPA 7471B Preparation Method: EPA 7471B									
Pace Analytical Services - Melville									
Mercury	<0.034	mg/kg	0.034	0.022	1	11/09/21 16:05	11/10/21 10:15	7439-97-6	
Percent Moisture									
Analytical Method: ASTM D2216-05M									
Pace Analytical Services - Melville									
Percent Moisture	9.7	%	0.10	0.10	1		11/04/21 16:01		

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ANALYTICAL RESULTS

Project: 012112502

Pace Project No.: 70193281

Sample: 012112502-0002 **Lab ID: 70193281002** Collected: 11/01/21 10:30 Received: 11/03/21 10:00 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report Limit	MDL	DF	Prepared	Analyzed	CAS No.	Qual
6010D MET ICP									
Analytical Method: EPA 6010D Preparation Method: EPA 3050B									
Pace Analytical Services - Melville									
Arsenic	<2.7	mg/kg	2.7	1.3	5	11/09/21 16:00	11/10/21 15:27	7440-38-2	
Cadmium	<0.69	mg/kg	0.69	0.078	5	11/09/21 16:00	11/10/21 15:27	7440-43-9	
Chromium	10.2	mg/kg	2.7	1.1	5	11/09/21 16:00	11/10/21 15:27	7440-47-3	
Iron	722	mg/kg	27.5	4.6	5	11/09/21 16:00	11/10/21 15:27	7439-89-6	
Lead	8.7	mg/kg	1.4	0.71	5	11/09/21 16:00	11/10/21 15:27	7439-92-1	
Manganese	5.8	mg/kg	4.1	1.3	5	11/09/21 16:00	11/10/21 15:27	7439-96-5	
Selenium	<2.7	mg/kg	2.7	1.6	5	11/09/21 16:00	11/10/21 15:27	7782-49-2	
Zinc	10400	mg/kg	5.5	3.4	5	11/09/21 16:00	11/10/21 15:27	7440-66-6	
7471 Mercury									
Analytical Method: EPA 7471B Preparation Method: EPA 7471B									
Pace Analytical Services - Melville									
Mercury	<0.031	mg/kg	0.031	0.020	1	11/09/21 16:05	11/10/21 10:18	7439-97-6	
Percent Moisture									
Analytical Method: ASTM D2216-05M									
Pace Analytical Services - Melville									
Percent Moisture	10.2	%	0.10	0.10	1		11/04/21 16:01		

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: 012112502

Pace Project No.: 70193281

Sample: 012112502-0003 **Lab ID: 70193281003** Collected: 11/01/21 11:15 Received: 11/03/21 10:00 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report Limit	MDL	DF	Prepared	Analyzed	CAS No.	Qual
6010D MET ICP									
Analytical Method: EPA 6010D Preparation Method: EPA 3050B									
Pace Analytical Services - Melville									
Arsenic	<2.4	mg/kg	2.4	1.2	5	11/09/21 16:00	11/10/21 15:29	7440-38-2	
Cadmium	<0.61	mg/kg	0.61	0.069	5	11/09/21 16:00	11/10/21 15:29	7440-43-9	
Chromium	<2.4	mg/kg	2.4	0.99	5	11/09/21 16:00	11/10/21 15:29	7440-47-3	
Iron	342	mg/kg	24.4	4.1	5	11/09/21 16:00	11/10/21 15:29	7439-89-6	
Lead	11.2	mg/kg	1.2	0.63	5	11/09/21 16:00	11/10/21 15:29	7439-92-1	
Manganese	4.1	mg/kg	3.7	1.2	5	11/09/21 16:00	11/10/21 15:29	7439-96-5	
Selenium	<2.4	mg/kg	2.4	1.4	5	11/09/21 16:00	11/10/21 15:29	7782-49-2	
Zinc	12200	mg/kg	4.9	3.0	5	11/09/21 16:00	11/10/21 15:29	7440-66-6	
7471 Mercury									
Analytical Method: EPA 7471B Preparation Method: EPA 7471B									
Pace Analytical Services - Melville									
Mercury	<0.031	mg/kg	0.031	0.020	1	11/09/21 16:05	11/10/21 10:19	7439-97-6	
Percent Moisture									
Analytical Method: ASTM D2216-05M									
Pace Analytical Services - Melville									
Percent Moisture	3.1	%	0.10	0.10	1		11/04/21 16:02		

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: 012112502

Pace Project No.: 70193281

QC Batch: 232505

Analysis Method: EPA 7471B

QC Batch Method: EPA 7471B

Analysis Description: 7471 Mercury

Laboratory: Pace Analytical Services - Melville

Associated Lab Samples: 70193281001, 70193281002, 70193281003

METHOD BLANK: 1172808

Matrix: Solid

Associated Lab Samples: 70193281001, 70193281002, 70193281003

Parameter	Units	Blank Result	Reporting Limit	MDL	Analyzed	Qualifiers
Mercury	mg/kg	<0.029	0.029	0.019	11/10/21 10:12	

LABORATORY CONTROL SAMPLE: 1172809

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	mg/kg	0.15	0.16	103	80-120	

MATRIX SPIKE SAMPLE: 1172810

Parameter	Units	70193281001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Mercury	mg/kg	<0.034	0.17	0.18	99	80-120	

SAMPLE DUPLICATE: 1172811

Parameter	Units	70193281001 Result	Dup Result	RPD	Max RPD	Qualifiers
Mercury	mg/kg	<0.034	<0.033		20	

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QUALITY CONTROL DATA

Project: 012112502

Pace Project No.: 70193281

QC Batch: 232567

Analysis Method: EPA 6010D

QC Batch Method: EPA 3050B

Analysis Description: 6010D MET

Laboratory: Pace Analytical Services - Melville

Associated Lab Samples: 70193281001, 70193281002, 70193281003

METHOD BLANK: 1173122

Matrix: Solid

Associated Lab Samples: 70193281001, 70193281002, 70193281003

Parameter	Units	Blank Result	Reporting Limit	MDL	Analyzed	Qualifiers
Arsenic	mg/kg	<0.49	0.49	0.23	11/10/21 14:49	
Cadmium	mg/kg	<0.12	0.12	0.014	11/10/21 14:49	
Chromium	mg/kg	<0.49	0.49	0.20	11/10/21 14:49	
Iron	mg/kg	<4.9	4.9	0.82	11/10/21 14:49	
Lead	mg/kg	<0.24	0.24	0.13	11/10/21 14:49	
Manganese	mg/kg	<0.73	0.73	0.24	11/10/21 14:49	
Selenium	mg/kg	<0.49	0.49	0.29	11/10/21 14:49	
Zinc	mg/kg	<0.98	0.98	0.61	11/10/21 14:49	

LABORATORY CONTROL SAMPLE: 1173123

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Arsenic	mg/kg	157	126	80	73-105	
Cadmium	mg/kg	125	88.0	70	63-94	
Chromium	mg/kg	70.7	53.5	76	69-102	
Iron	mg/kg	15000	11600	78	54-130	
Lead	mg/kg	57.2	54.0	94	82-116	
Manganese	mg/kg	541	412	76	67-101	
Selenium	mg/kg	41.7	33.4	80	66-104	
Zinc	mg/kg	216	168	78	68-104	

MATRIX SPIKE SAMPLE: 1173125

Parameter	Units	70193277001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Arsenic	mg/kg	<2.4	24.2	22.5	88	75-125	
Cadmium	mg/kg	<0.60	24.2	22.6	93	75-125	
Chromium	mg/kg	<2.4	24.2	23.0	95	75-125	
Iron	mg/kg	25.2	605	571	90	75-125	
Lead	mg/kg	7.0	24.2	27.3	84	75-125	
Manganese	mg/kg	<3.6	24.2	23.0	92	75-125	
Selenium	mg/kg	<2.4	24.2	23.3	92	75-125	
Zinc	mg/kg	22.7	24.2	31.9	38	75-125	M1

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QUALITY CONTROL DATA

Project: 012112502

Pace Project No.: 70193281

SAMPLE DUPLICATE: 1173124

Parameter	Units	70193277001 Result	Dup Result	RPD	Max RPD	Qualifiers
Arsenic	mg/kg	<2.4	<2.4		20	
Cadmium	mg/kg	<0.60	<0.61		20	
Chromium	mg/kg	<2.4	<2.4		20	
Iron	mg/kg	25.2	26.7	6	20	
Lead	mg/kg	7.0	6.1	15	20	
Manganese	mg/kg	<3.6	<3.6		20	
Selenium	mg/kg	<2.4	<2.4		20	
Zinc	mg/kg	22.7	43.0	62	20	D6

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QUALITY CONTROL DATA

Project: 012112502

Pace Project No.: 70193281

QC Batch: 232032

Analysis Method: ASTM D2216-05M

QC Batch Method: ASTM D2216-05M

Analysis Description: Dry Weight/Percent Moisture

Laboratory: Pace Analytical Services - Melville

Associated Lab Samples: 70193281001, 70193281002, 70193281003

SAMPLE DUPLICATE: 1170350

Parameter	Units	70192726001 Result	Dup Result	RPD	Max RPD	Qualifiers
Percent Moisture	%	78.5	79.2	1	20	

SAMPLE DUPLICATE: 1170629

Parameter	Units	70192726002 Result	Dup Result	RPD	Max RPD	Qualifiers
Percent Moisture	%	17.2	17.8	3	20	

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REPORT OF LABORATORY ANALYSIS

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QUALIFIERS

Project: 012112502
Pace Project No.: 70193281

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above adjusted reporting limit.

TNTC - Too Numerous To Count

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PQL - Practical Quantitation Limit.

RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Reported results are not rounded until the final step prior to reporting. Therefore, calculated parameters that are typically reported as "Total" may vary slightly from the sum of the reported component parameters.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

ANALYTE QUALIFIERS

D6 The precision between the sample and sample duplicate exceeded laboratory control limits.

M1 Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: 012112502

Pace Project No.: 70193281

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
70193281001	012112502-0001	EPA 3050B	232567	EPA 6010D	232669
70193281002	012112502-0002	EPA 3050B	232567	EPA 6010D	232669
70193281003	012112502-0003	EPA 3050B	232567	EPA 6010D	232669
70193281001	012112502-0001	EPA 7471B	232505	EPA 7471B	232733
70193281002	012112502-0002	EPA 7471B	232505	EPA 7471B	232733
70193281003	012112502-0003	EPA 7471B	232505	EPA 7471B	232733
70193281001	012112502-0001	ASTM D2216-05M	232032		
70193281002	012112502-0002	ASTM D2216-05M	232032		
70193281003	012112502-0003	ASTM D2216-05M	232032		

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[illegible]

Pace Analytical®

Client Name:

Proje

PM: SSB

Due Date: 11/10/21

EMSL

CLIENT: EMSL-NJ

Courier: ☒ Fed Ex ☐ UPS ☐ USPS ☐ Client ☐ Commercial ☐ Pace ☐ Other

Tracking #: 2856 4261 0601

Custody Seal on Cooler/Box Present: ☐ Yes ☒ No Seals intact: ☐ Yes ☒ No ☐ N/APacking Material: ☐ Bubble Wrap ☐ Bubble Bags ☒ Ziploc ☐ None ☐ OtherThermometer Used: ~~TH091~~ TH176 Correction Factor: +0.1

Cooler Temperature(°C): 17.5 Cooler Temperature Corrected(°C): 17.6

Temp should be above freezing to 6.0°C

USDA Regulated Soil (☐ N/A, water sample)

Date and Initials of person examining contents: MW 11/3/21

Did samples originate in a quarantine zone within the United States: AL, AR, CA, FL, GA, ID, LA, MS, NC,

Did samples originate from a foreign source

NM, NY, OK, OR, SC, TN, TX, or VA (check map)? ☐ Yes ☐ Noincluding Hawaii and Puerto Rico)? ☐ Yes ☒ No

If Yes to either question, fill out a Regulated Soil Checklist (F-LI-C-010) and include with SCUR/COC paperwork.

				COMMENTS:
Chain of Custody Present:	☒ Yes	☐ No		1.
Chain of Custody Filled Out:	☒ Yes	☐ No		2.
Chain of Custody Relinquished:	☒ Yes	☐ No		3.
Sampler Name & Signature on COC:	☒ Yes	☐ No	☐ N/A	4.
Samples Arrived within Hold Time:	☒ Yes	☐ No		5.
Short Hold Time Analysis (<72hr):	☐ Yes	☒ No		6.
Rush Turn Around Time Requested:	☐ Yes	☒ No		7.
Sufficient Volume: (Triple volume provided for I)	☒ Yes	☐ No		8.
Correct Containers Used:	☒ Yes	☐ No		9.
-Pace Containers Used:	☒ Yes	☐ No		
Containers Intact:	☒ Yes	☐ No		10.
Filtered volume received for Dissolved tests	☐ Yes	☐ No	☒ N/A	11. Note if sediment is visible in the dissolved container.
Sample Labels match COC:	☒ Yes	☐ No		12.
-Includes date/time/ID/ Matrix: SL-WF OIL				
All containers needing preservation have been checked?	☐ Yes	☐ No	☐ N/A	13. ☐ HNO ₃ ☐ H ₂ SO ₄ ☐ NaOH ☐ HCl
pH paper Lot #				Sample #
All containers needing preservation are found to be in compliance with method recommendation?				
(HNO ₃ , H ₂ SO ₄ , HCl, NaOH>9 Sulfide, NaOH>12 Cyanide)	☐ Yes	☐ No	☐ N/A	
Exceptions: VOA, Coliform, TOC/DOC, Oil and Grease, DRO/8015 [water].				
Per Method, VOA pH is checked after analysis				
Samples checked for dechlorination:	☐ Yes	☐ No	☐ N/A	14. Initial when completed: Lot # of added preservative: Date/Time preservative added:
KI starch test strips Lot #				
Residual chlorine strips Lot #				Positive for Res. Chlorine? Y N
SM 4500 CN samples checked for sulfide?	☐ Yes	☐ No	☐ N/A	15. Positive for Sulfide? Y N
Lead Acetate Strips Lot #				
Headspace in VOA Vials (>6mm):	☐ Yes	☐ No	☐ N/A	16.
Trip Blank Present:	☐ Yes	☐ No	☐ N/A	17.
Trip Blank Custody Seals Present	☐ Yes	☐ No	☐ N/A	
Pace Trip Blank Lot # (if applicable):				

Client Notification/ Resolution:

Field Data Required?

Y / N

Person Contacted:

Date/Time:

Comments/ Resolution:

41779

LABORATORY

EMSL (N5)

Analysis Request

Date: 11/01/21

—

S=Soil
C=Concrete
B=Sediment

rubber

Request

Full VOC list and TICs
Full SVOC list by TO-15
Metals (As, Cd, Cr, Pb, Fe, Mn, Hg, Se, Zn) by 6010/7470

Soil VOA Vial, ☐ methanol
Soil VOA Vial, ☐ water ☐ Na₂(SO₄)₂
Glass Soil Container (4 oz)
Other:
Other:

Water VOA Vial, ☐ As is ☐ HCl
Glass Amber () ml, ☐ As is ☐ H₂SO₄
Plastic - As is, ☐ 250 ml ☐ 500 ☐ 1000 ml
Plastic - H₂SO₄, ☐ 250 ml ☐ 500 ml
Plastic - HNO₃, 250 ml ☐ Filtered ☐ 0.45μ ☐ 10μ
Plastic - NaOH, 250 ml

Comments

—

Reporting and Detection Limit Requirements: ☐ RCP Deliverables ☐ MCP CAM Cert.

Additional Comments:

same parameter list as previously

Appendix B

Sampling Equipment

Sampling Equipment

Analyte	Description	Calibration
Volatile Organic Compounds (VOCs)	Ion Science Tiger Photoionization Detector	Calibrated by Rental Company Verified Prior to Use
Surface Temperature & Relative Humidity	TSI Q-Trak Air Quality Monitor	Verified Prior to Use

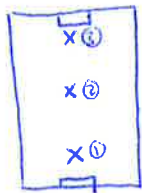
Appendix C

Field Data Sheets

Crumb Rubber Sampling Field Data

Client/Project Name: Needham Crumb Rubber		 FUSS & O'NEILL
Project Location: Needham, MA	PROJECT #: 20081266.B20	
Sample#: 1609211101- 01	<u>Sample Location ID</u> <i>Founder's field</i>	

Sample Location Description (include sketch map with location of sample)



Sample Data

Sample Data	Container	Quantity	Preservative
Date: <u>11/01/2021</u> Time: <u>09:45</u> Sampler: <u>WT</u> Weather: Ambient Temperature: <u>70.1°F</u> Relative Humidity: <u>59.1%</u> } <u>TS1</u> Barometric Pressure: <u>29.86 inHg</u> } <u>IAQ-Cat</u> Sampling Device: Auger / Core Sampler / Shovel / <u>Trowel</u> / Other _____ Field decon: Yes / No / <u>Dedicated</u> Type of Sample: Grab / <u>Composite</u> / <u>3-point</u> / Other _____ PID Reading (ppm): <u>0.8</u>	4oz Amber	3	

Description Data

Generic Sample Description: Crumb rubber , mast.

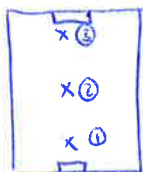
Comments:

②	58.1 °F		③	54.6 °F
	63.3 % RH			61.9 % RH

Crumb Rubber Sampling Field Data

Client/Project Name: Needham Crumb Rubber		 FUSS & O'NEILL
Project Location: Needham, MA	PROJECT #: 20081266.B20	
Sample#: 1609211101- 02	<u>Sample Location ID</u> Brock Field	

Sample Location Description (include sketch map with location of sample)



Sample Data

Sample Data	Container	Quantity	Preservative
Date: 11/01/2021 Time: 10:30 Sampler: WT Weather: Ambient Temperature: 61.9°F } TSI IAQ calc. Relative Humidity: 56% RH } Barometric Pressure: 29.86 inHg Sampling Device: Auger / Core Sampler / Shovel / <u>Trowel</u> / Other _____ Field decon: Yes / No / <u>Dedicated</u> Type of Sample: Grab / <u>Composite</u> / 3-point Other _____ PID Reading (ppm): 0.7	4oz Amber	3	---

Description Data

Generic Sample Description: Crumb rubber, dry moist
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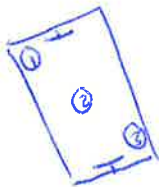
Comments:

② 66.3°F ③ 58.1°F
 55.8% RH 53.9% RH

Crumb Rubber Sampling Field Data

Client/Project Name: Needham Crumb Rubber		 FUSS & O'NEILL
Project Location: Needham, MA	PROJECT #: 20081266.B20	
Sample#: 1609211101- 03	<u>Sample Location ID</u> Memorial Park	

Sample Location Description (include sketch map with location of sample)



Sample Data

Sample Data	Container	Quantity	Preservative
Date: 11/01/2021 Time: 11:15 Sampler: WT Weather: Ambient Temperature: 63°F Relative Humidity: 39.6% RH Barometric Pressure: 29.86 inHg (Local Conditions.com) Sampling Device: Auger / Core Sampler / Shovel / <u>Trowel</u> / Other Field decon: Yes / No / <u>Dedicated</u> Type of Sample: Grab / <u>Composite</u> / Other PID Reading (ppm): 0.9	4oz Amber	3	

Description Data

Generic Sample Description: Crumb rubber, Dry

Comments: ② ~~66.8°F~~ 64.5°F 31.5% RH ③ 66.7°F 32.2% RH