

INDEX OF DOCUMENTS RELATED TO TRUSTEES'  
NATURAL RESOURCE DAMAGES CLAIM IN CONNECTION WITH  
INDUSTRI-PLEX SUPERFUND SITE LOCATED IN WOBURN, MASSACHUSETTS

1. Habitat Equivalency Analysis – Industri-plex Operable Unit (OU)-2 Superfund Site Woburn, Massachusetts (“Site”), prepared by U.S. Department of the Interior/U.S. Fish and Wildlife Service (April 27, 2007). The HEA sets forth an estimate of the injury caused to natural resources at the Site as a result of arsenic and chromium contamination. The Trustees focused on these two contaminants because the Settling Defendants (or their predecessors) disposed of arsenic and/or chromium at their former manufacturing operations located in the northern portion of the Site and these hazardous substances have migrated at least as far south as the Mystic Lakes. The HEA divides the site into 22 different geographical areas and determines, for each area, the number of acre-years of injury caused by the arsenic and chromium contamination (starting as of 1981 and continuing through 2039, at a 3% discount rate). This determination was based, in part, on the levels of arsenic and chromium in the sediments at each location as compared to levels expected to cause injury based on various scientific studies in the literature. Several different types of habitat were addressed by the HEA, including wetland, river/lake/pond, and upland. The HEA assumed that the Site would recover over a 25-year period (following completion of EPA’s 2006 remedy for the Site) as a result of natural attenuation. Once EPA's 2006 remedy reduces the discharge of arsenic and chromium into the Aberjona River from groundwater sources, the Trustees estimated that it would take 25 years for 15 cm. of clean sediment to accumulate in the river. The injury calculated by the HEA is an interim injury occurring from 1981 to the end of this 25-year period, when the natural recovery due to the buildup of clean sediment is expected to be completed. The HEA calculated a total injury for wetland habitat of 671 discounted service acre-years, for river/lake/pond habitat of 442 discounted service acre-years, and for upland habitat of 8 discounted service acre-years. Using a ratio of 1:3.2 to compare the value of a wetland habitat to a river/lake/pond habitat, the 442 discounted service acre-years of injury to river/lake/pond habitat translates to 138 discounted service acre-years of wetland injury, resulting in a total injury of 809 discounted acre-years of wetland services. Finally, the HEA determined that the creation of one acre of wetlands would have a benefit of 14.82 discounted acre-years of wetland services, that the restoration of one acre of wetlands would have a benefit of 11.48 discounted acre-years of wetland services, that the enhancement of one acre of wetlands would have a benefit of 3.6 discounted acre-years of wetland services, and that the restoration of one acre of river/lake/pond habitat would have the benefit of 3.6 discounted acre-years of river/lake/pond services.

2. Potential Restoration Projects for Industri-plex Superfund Site , prepared by Trustees (July 2008): In order to estimate the cost of implementing restoration projects to compensate for the injury calculated in the HEA, the Trustees identified 15 potential restoration projects and estimated the cost of each project. The Trustees calculated a total cost for all 15 projects of \$3,553,860. Based on the restoration calculations in the HEA, the Trustees determined that these fifteen projects would be sufficient to compensate for 574 discounted wetland service acre-years of injury, or about 59% of the total injury of 809 discounted wetland acre-years. Assuming that similar projects would be implemented to cover the remaining 41% of the injury, the Trustees estimated that the total cost of the restoration actions needed to compensate for the injury would be \$5,010,943. It should be noted that the Trustees have not yet begun formal restoration planning. After the settlement is approved by the Court, the Trustees will begin the formal restoration planning process, which will include an opportunity for public comment on proposed restoration projects. At that time, the Trustees will further evaluate the feasibility, restoration benefits, likelihood of success and cost effectiveness of some or all of the 15 potential projects identified in July 2008 and will work to identify and evaluate other potential restoration alternatives as well.
3. Trustee Assessment Costs and Estimated Cost of Restoration Planning for the Industri-plex Superfund Site in Woburn, Massachusetts, prepared by Trustees (August 2012). This document sets forth the Trustees' costs of assessment as well as their estimate of restoration planning costs.
4. Summary of Proposed Natural Resource Damages Settlement Related to Industri-plex Superfund Site, Woburn, Massachusetts, prepared by Trustees (August 2012). This document provides background information concerning the settlement.