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DRAFT Analysis of Brownfields Cleanup Alternatives

Former A-1 Deli
88-92 Merrimack Street
Haverhill, Massachusetts 01832

Prepared for and funded by:
Merrimack Valley Planning Commission
160 Main Street
Haverhill, Massachusetts 01830
EPA Brownfields Assessment Grant #: 4B00A01088

On behalf of:
L'Arche Boston North
53 Wingate Street
Haverhill, Massachusetts 01832

Prepared by:
Credere Associates, LLC
776 Main Street
Westbrook, Maine 04092

October 24, 2025

In Reference to:
Credere Project No. 23001742

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1. INTRODUCTION

Credere Associates, LLC (Credere) was retained by the Merrimack Valley Planning Commission (MVPC) on behalf of the L'Arche Boston North (L'Arche) to prepare this Analysis of Brownfields Cleanup Alternatives (ABCA) for the cleanup and redevelopment of the property located at 88-92 in the City of Haverhill, Essex County, Massachusetts (Site). MVPC will use funding from a US Environmental Protection Agency (EPA) Brownfield Grant (Grant number: 4BF0A01088) to fund this ABCA.

1.1 Purpose and Scope

The purpose and scope of this ABCA is to identify and select cleanup alternative(s) to address the presence of hazardous building materials inside the building and on exterior street facing windows. Detected building materials include asbestos, polychlorinated biphenyls (PCBs), lead paint, mold, and universal waste associated with the Site building. It needs to be noted that no releases have been documented to soil, groundwater, or soil vapor at the Site and the Site does not have any Massachusetts Department of Environmental Protection (MassDEP) Release Tracking Numbers (RTNs).

1.2 Site Description

The Site comprises one (1) parcel totaling approximately 0.08 acres. 88 and 92 Merrimack Street are connected and function as one building with two stories. The Site is entirely occupied by a two (2)-story 7,287 square-foot building that is currently vacant and most recently operated as A-1 Deli. The first floor of the building consists of two dining areas, a counter, and a kitchen. The second floor consists of event and multipurpose rooms. An attic crawlspace above 92 Merrimack Street is accessible from a second floor bathroom. There are two separate basements, one accessible from 88 Merrimack Street and one from 92 Merrimack Street.

Electric and natural gas services are provided to the Site by National Grid. Water and wastewater services are provided by the City of Methuen.

A Site Location Plan has been provided as **Figure 1**, and pertinent Site details are depicted on **Figure 2**.

1.3 Site History

The Site building was constructed in 1840, which is inscribed on the façade. The building was originally three (3) stories tall and, over time, included units with addresses ranging from 88 to 98 Merrimack Street.

By 1886, the Site was developed with three (3) units within the Kittredge Building, which extended to the east and west along Merrimack Street. The units were occupied by a fancy goods store, a milliner, and a tenement. By 1893, all three (3) units in the Site building were occupied by retail stores. From 1906 to 1965, the Site was occupied by various businesses, including jewelers, a

beauty salon, an insurance company, interior designs, and Whelan Drug. In the 1940s and 1950s, the Site building contained three (3) stories; however, at some time in the 1950s, the third floor was removed for reasons unknown.

By 1984, the Site was occupied by A-1 Deli, Vathally's Coffee, Pantelis Jewelry, Old Valley Crafter, and Anton's Beauty. In 2005, 92 Merrimack Street was occupied by Mr. K's Auto School. In 2002, there was a fire that appeared to have started in an outside dumpster and spread into the building, causing minimal damage. By 2010, A-1 Deli had expanded to occupy the entire Site, and it remained until 2025. The Site is currently vacant.

1.4 Section 106 Historical Review

Credere (through EPA) will submit a project notification letter to the Massachusetts Historical Commission (MHC) requesting a review for the proposed cleanup activities (building abatement and demolition) pursuant to the Section 106 National Historic Preservation Act (36 CFR Part 800). A review of the building's historical and/or archaeological significance is required for all federally funded projects.

1.5 Proposed Redevelopment Plan

The proposed future redevelopment plan for the Site includes renovation of the interior of building into restaurant with apartments to support on upper floors. The building formerly contained a third floor which was reportedly lost to fire. The redevelopment would involve adding back the third floor.

L'Arche works to create spaces of genuine belonging for people with and without intellectual disabilities. The redeveloped building will be used to employ and train people in the restaurant as well as allow them to live in the apartments above.

2. SUMMARY OF PREVIOUS INVESTIGATIONS

The following are summaries of documents that were identified for the Site during Credere's research.

Phase I Environmental Site Assessment, Credere Associates, LLC, February 25, 2025

Credere completed a Phase I Environmental Site Assessment (ESA) for the Site dated February 25, 2025, for MVPC on behalf of L'Arche. The Phase I ESA included State and Federal file reviews, interviews with current and past owners and local government officials, and Site reconnaissance. Based on a review of historical sources, environmental databases, interviews, User provided information, Site reconnaissance, and judgment by the Environmental Professional, the February 25, 2025, Phase I ESA revealed no recognized environmental conditions (RECs) in connection with the Site. However, the following environmental findings, which do not meet the definition of a REC, historical REC (HREC), controlled REC (CREC), or *de minimis* condition (DMC), but do warrant the opinion of an environmental professional and may represent some degree of business environmental risk, were identified.

- Environmental Finding #1 – Potential presence of asbestos containing materials (ACMs) in/on the Site building
- Environmental Finding #2 – Potential presence of lead paint in/on the Site building
- Environmental Finding #3 – Potential presence of polychlorinated biphenyl (PCB)-containing materials in/on the Site building
- Environmental Finding #4 – Potential presence of radon above 4 picocuries per liter (pCi/L)
- Environmental Finding #5 – Known presence of mold in basement storage area

Based on the identified environmental findings, Credere recommended the following:

- Performance of a Hazardous Building Materials Survey (HBMS) to assess Site building materials if redevelopment activities will involve a change in use, i.e., from commercial to residential, or if building materials will be impacted during planned renovations

Pre-Renovation Hazardous Building Materials Survey, Credere Associates, LLC, July 18, 2025

From June 3 to 5, 2025, Credere conducted a pre-renovation HBMS for MVPC, on behalf of L'Arche, to assess for ACMs, lead paint, PCB-containing building materials, radon, and other regulated or universal wastes within the Site building. The following was identified during the HBMS :

- Four (4) ACMs were identified within the building, including approximately 100 square feet (sf) of linoleum of various colors in the 88 Merrimack Street basement; 1,000 square feet of yellow carpet adhesive in the 92 Merrimack Street first floor; 400 square feet of

linoleum of various colors in the kitchen; and 60 linear feet of black window caulk on the front exterior windows.

- Lead-containing paints (LCPs) were identified throughout the interior and exterior of the Site building.
- One (1) excluded PCB Bulk Product waste material, i.e., greater than 1 milligram per kilogram (mg/kg) but less than 50 mg/kg, black exterior window caulk, was identified on the front exterior of 88 Merrimack Street.
- Radon results for all radon testing locations were below the 2 pCi/L threshold for consideration of mitigation.
- The universal waste inventory included fluorescent light fixtures and bulbs, fridges, freezers, roof tar, mercury thermostats, fire extinguishers, exit signs, paint cans, waste oil drums, bleach, and degreaser in the Site building.

3. CONCEPTUAL SITE MODEL

A Conceptual Site Model (CSM) was developed using the findings of previous investigations and may be revised or updated in the future if new information becomes available. The CSM includes a Site description, Site history, description of the area and physical setting of the Site, source areas and contaminants of interest (COIs), contaminants of potential concern (COPCs), nature and extent of contamination, exposure pathways, and potential human and environmental receptors.

3.1 Area and Physical Setting

The northern adjoining property is used as a parking lot, while the southern, eastern and western adjoining properties are developed with a mix of commercial and office spaces (see **Figure 2**).

According to the United States Geological Survey (USGS) 1:24,000 Surficial Geology Mass geographic information system (GIS) Data map, consisting of data layers created by a USGS study, the Site is underlain by floodplain alluvium, which consists of sand, silt and gravel within a present-day floodplain. According to the United States Geologic Survey map, Bedrock Geologic Map of Massachusetts, the Site is underlain by the Silurian Berwick Formation, which generally consists of calcareous metasandstone and metasiltstone, with minor muscovite schist.

The Site is located within the surficial drainage basin of the Merrimack River, located approximately 160 feet southeast of the Site, which flows east into the Atlantic Ocean. No surface water bodies are present on the Site. Stormwater likely infiltrates permeable surfaces surrounding the Site or flows into catch basins along Merrimack Street or overland to the Merrimack River.

3.2 Description of Existing Structure

The first floor of the Site building consists of two (2) dining areas, a counter, and a kitchen. The second floor consists of event and multipurpose rooms. An attic crawlspace above 92 Merrimack Street is accessible from a second-floor bathroom. Two (2) separate basements were observed; one (1) accessible from 88 Merrimack Street, is finished and used primarily for storage of furniture and decorations; the second accessible from the kitchen, with a concrete floor and stone or brick walls, used for food storage, including multiple walk-in refrigerators, prep space, and utility space. The second basement contains a natural gas heating system and a water heater.

3.3 Site Environmental Hazards and COIs

The following contaminant source areas were identified on Lot 80 based on the previous investigations at the Site.

- Site building components

Based on previous environmental investigations, current COPCs associated with the source area that have been previously documented to exceed applicable regulatory standards include the following:

- ACM

- LCP
- PCB-containing materials
- Mold
- Universal waste

ACM, in the form of multiple colors of linoleum flooring, yellow carpet adhesive, and black exterior window caulk, was identified during the 2025 pre-renovation HBMS conducted by Credere. The extent of asbestos is confined to these building materials, although it is possible previously inaccessible ACM may be encountered during future renovations. PCBs were also identified in one material: black exterior window caulk. Mold was identified prior to the HBMS.

LCP was identified on materials both in the Site building and on the building exterior. Those materials identified on the interior will require proper abatement prior to renovation. LCP on a building exterior tends to degrade, or the lead can leach from the paint into stormwater. Therefore, abatement will likely be minimal on the exterior of the building. Because the ground surface surrounding the Site building is paved and, therefore, impervious to stormwater flow, lead impacts to soil from the LCP on the building exterior are not anticipated.

3.4 Identified Site Risks

The environmental hazards in the building pose a potential risk to human health if the building was to be used in its present "as is condition" without further renovation. Risks posed by asbestos, lead paint, PCBs, and mold in building materials include:

Material Risk	Potential Exposure Pathway(s)	Exposure Pathway
Asbestos (non-friable)	Inhalation / Incidental Ingestion	Asbestos fibers may become airborne if materials are damaged or disturbed. Receptors can inhale or accidentally ingest fibers present in dust or debris.
Lead Paint	Ingestion	Ingestion of lead-contaminated dust, paint chips, or soil. Most common in children or through poor hygiene practices in occupational settings. Once ingested or absorbed, lead enters the bloodstream and can cause systemic health effects.
PCBs	Dermal Contact	PCBs in caulks can be absorbed through skin contact, especially during material handling or renovation.
	Inhalation	Volatilization of PCBs from building materials or contaminated dust can lead to inhalation exposure, particularly in poorly ventilated indoor environments.

Material Risk	Potential Exposure Pathway(s)	Exposure Pathway
	Ingestion	Incidental ingestion of PCB-laden dust or contaminated soil, especially in children or through hand-to-mouth contact in occupational settings.
Mold	Inhalation	Mold may become airborne if materials where it is present are damaged or disturbed. Receptors can inhale or accidentally ingest spores present in dust or debris.
Universal Waste	Inhalation, Ingestion*	Inhalation or incidental ingestion of universal wastes can occur if the wastes are damaged, disturbed, or improperly disposed of.

*Universal waste has multiple potential exposure pathways depending on waste encountered and they are not all detailed here.

The Site building was most recently operated as a restaurant; however the building is currently vacant. During future renovation/abatement activities construction workers will have a risk of exposure to asbestos fibers in air, lead-based paint, and PCBs for short durations but at significantly higher intensities. Potential exposure pathways during renovation include inhalation of airborne asbestos fibers and PCB/lead-based laden dust due to material disturbance, dermal contact with hazardous surfaces, such as PCB-containing caulk or lead paint, and ingestion of particulates via hand-to-mouth contact. Adherence to regulatory safety standards and implementation of proper engineering controls and personal protective equipment (PPE) are necessary to mitigate potential health risks in this scenario.

4. CLEANUP GOALS AND APPLICABLE GUIDELINES

Redevelopment/renovation plans call for all construction materials within the buildings to be impacted. As such, complete removal/abatement of the identified hazardous building materials is considered the only the cleanup goal is to mitigate identified risks to human health posed by the identified COPCs at the Site. To achieve this objective, the following cleanup goals or guidelines will be applicable to the cleanup of the Site.

4.1 Cleanup Goal No. 1 – Asbestos-Containing Materials Abatement

The cleanup goal for ACM is that any ACM to be impacted by renovation activities be properly abated prior to those activities to eliminate any potential exposure to construction workers. Construction work involving exposure or potential exposure to any concentration of asbestos is regulated by the United States Occupational Safety and Health Administration (OSHA) 29 CFR 1910. Post renovation conditions required for the Site are discussed in Massachusetts Department of Labor Standards (DLS) Statutes 453 CMR 6.00 – The Removal, Containment, or Encapsulation of Asbestos, and Massachusetts Department of Environmental Protection (MassDEP) 310 CMR 7.15: Asbestos. Proper removal of ACM to be impacted by renovation activities in accordance with DLS and MassDEP requirements is crucial to the achievement of this goal. Asbestos removal, handling and oversight will be conducted by appropriately trained and certified personnel. Interior asbestos will be removed in full and a visual clearance and air clearance of the asbestos abatement areas will be conducted by a Massachusetts-certified Asbestos Air Monitor prior to releasing the abatement area.

4.2 Cleanup Goal No. 2 – Lead Paint Removal

The cleanup goal for LCP is that any LCP to be impacted by renovation activities be properly handled to eliminate any potential exposure to construction workers. It is required that contractors performing construction work involving lead-painted surfaces employ proper health and safety practices in accordance with OSHA standards set forth in 29 CFR 1926.62 and it is recommended that work be done in accordance with EPA's Renovate, Repair, and Painting guidelines.Lead paint waste generated will be properly characterized and disposed of offsite at an appropriately licensed landfill or recycling facility.

4.3 Cleanup Goal No. 3 – PCB-Containing Material Removal

The cleanup goal for PCB-containing materials is that all PCB-containing materials be properly removed as required to eliminate any potential exposure to construction workers. PCBs present in caulking materials at concentrations less than 50 mg/kg are not regulated for removal under the United States Environmental Protection Agency's (EPA) Toxic Substances Control Act (TSCA) regulations 40 CFR 761 as PCB Bulk Product Waste. However, potential exposure to PCBs during construction activities still warrants appropriate management to protect worker health and ensure proper waste handling.

4.4 Cleanup Goal No. 4 – Mold Abatement

The goal of this project will be removal all visible mold, mold substrate, and mold sources prior to or during building renovation.

4.5 Cleanup Goal No. 5 – Universal Waste Removal

Various types of universal waste are located throughout the building, and will be removed and recycled or disposed of, as appropriate, prior to or during building renovation.

5. PRESUMPTIVE CLEANUP MEASURES

As indicated above, redevelopment/renovation plans call for all construction materials within the buildings to be impacted. As such, complete removal/abatement of the various identified hazardous building materials and universal wastes are considered presumptive remedies that must be undertaken to mitigate risks to future building commercial workers and residents. The above cleanup objectives have been established to ensure proper management of each hazardous building material. The presumptive cleanup measures that will be performed to accomplish the cleanup goals, as described in **Section 4,** are discussed in this section.

5.1 Asbestos Abatement

Removal and proper disposal of ACMs is considered presumptive because this must occur before renovations to certain areas of the Site building. All ACM will be disposed of at a landfill that is appropriately licensed. **Figures 3** through **5** show the locations of ACMs. Approximate quantities of ACMs are as follows:

- Linoleum of various colors in the 88 Merrimack Street basement (approximately 100 square feet)
- Yellow carpet adhesive in the 92 Merrimack Street Deli (approximately 1,000 square feet)
- Linoleum of various colors in the kitchen (approximately 400 square feet)
- Black window caulk on the front exterior windows (approximately 60 linear feet)

All ACM will be abated via methods that comply with Massachusetts and EPA regulations.

5.2 Lead Paint Removal

Removal and proper disposal of LCP throughout the Site building is considered presumptive because this must occur as part of the building renovations. LCP is present on various wood and metal surfaces throughout the interior and exterior of the Site Building. Because of the extent of renovation activities, removal of LCP will occur via whole component removal. All LCP impacted material will be properly disposed of at a landfill able to accept the waste.

5.3 PCB-Containing Material Removal

The removal and proper management of PCB-containing material is considered presumptive because of planned renovation activities throughout the Site building. PCBs were identified in black exterior window caulk on the front of 88 Merrimack Street. All PCB-impacted materials will be properly disposed of at a landfill licensed to accept the waste. PCB-containing materials are as follows:

- Black window caulk on the front exterior of 88 Merrimack Street

5.4 Universal Waste Removal

Universal waste is known to be present inside the building. Universal waste will be removed and recycled as per state regulations (310 CMR 30.1001 – *Standards for Universal Waste Management)* and the federal Universal Waste Rule (Title 40 CFR Part 273). Identified universal waste includes:

- 3' fluorescent light fixtures (ballasts)
- 3' fluorescent bulbs
- Fridges
- 5-gallon roof tar
- Mercury thermostats
- Fire extinguishers
- Exit signs
- 9-gallon paint
- Waste oil drums
- 2-gallon bleach
- 1-gallon degreaser

6. CLIMATE CHANGE ADAPTATION AND GREEN REMEDIATION TECHNIQUES

6.1 Impacts of Climate Change

New England is experiencing higher sea levels and increasing inundation of low-lying coastal areas. More extreme precipitation events have resulted in increased flooding hazards, especially on roadways, and more severe droughts have occurred in the summer months. The Merrimack River is located 160 feet southeast of the Site and the Site is estimated to be 20-feet above the river.

The Site is located in a highly developed urban upland and inland (non-coastal) area that is not highly vulnerable to hazards associated with potential climate change impacts, such as wildfires, landslides, erosion, flooding or drought events. The Site is situated approximately 160 feet northwest of the Merrimack River, outside the floodplain, and approximately 14 miles from the Atlantic Ocean. Therefore, the Site is not at high risk from sea level rise or coastal inundation.

The proposed cleanup is a low-risk scenario with respect to potential future impacts from climate change, as the cleanup will be conducted in the next year. Hazardous materials abatement will not involve long-term monitoring and because all materials and universal wastes are being removed and properly disposed.

Based on the Site location and the anticipated short cleanup timeframe, impacts from climate change relative to the proposed cleanup are low or unlikely.

6.2 Green Remediation Techniques

The above presumptive cleanup measures will involve abatement of hazardous materials. Abatement and renovation work will involve offsite disposal of hazardous building materials and construction materials. Asbestos materials will require disposal in a permitted landfill licensed to accept asbestos waste. Various Best Management Practices (BMPs) with regard to water, waste and energy will be considered as follows:

Waste Disposal and Transportation: Removed/abated materials will require offsite management by truck. The Site is also proximal to Worcester, Massachusetts, which is a hub for transportation by rail. Local contractors and local disposal facilities, where possible, will be used.

7. SCHEDULE AND CLEANUP COST

The cleanup will be funded by a Brownfields Revolving Loan Fund sub-grant from MVPC. L'Arche has already retained contractors to execute the presumptive cleanup approach presented herein, are currently in preparation. As required by the EPA cooperative agreement, a Community Involvement Plan (CIP) for the proposed cleanup has been prepared and is available for public review in the City of Haverhill document repository.

A public meeting on the proposed cleanup will be held in Merrimack Valley Planning Commission (MVPC) offices. The public meeting will be held during the EPA required 30-day public comment period. The public comment will begin up submission of this ABCA to the EPA and the meeting will be approximately 3 weeks into the process. After the public comment period, this ABCA will be finalized incorporating the EPA's and public.

The estimated cost for the Presumptive Cleanup Measures presented in this ABCA, including costs for engineering and an environmental remediation contractor, is presented below.

1. Oversight of Remediation, Abatement, and Demolition	$16,000
2. Remediation Management	$22,650
3. Hygienist Oversight (labor only)	$5,000
4. Asbestos Abatement/Mold Remediation/Demolition	$223,500
Total	**$267,150**

8. SUMMARY

Credere Associates, LLC (Credere) was retained by the Merrimack Valley Planning Commission (MVPC) on behalf of the City of Lawrence (City) to prepare this ABCA for the cleanup and redevelopment of A-1 Deli located at 88-92 Merrimack Street (Tax Map 101-1, Lots 4 and 5) in the City of Haverhill, Massachusetts (Site). The purpose of this study is to identify the presumptive cleanup measure to mitigate identified environmental conditions at the Site and which would allow for continued assessment of subsurface soil beneath the building. Based on the ABCA presented in this report:

1. Remedial action is necessary to address PCBs, lead paint, asbestos, and mold in the Site building. Additionally, universal waste present in the building will also be needed to be removed and property disposed.
2. In consideration of the CSM, applicable regulatory guidelines, and the nature of the specific contaminants detected, Credere identified the primary means of cleanup to as abatement and removal of the identified hazardous building materials including: ACM, LCP, PCB-containing materials, and mold. The presumptive cleanup measures also include removal/disposal of universal waste. No other remedial alternatives were evaluated because the redevelopment plan calls for all hazardous building material to be impacted.
3. All ACM, LCP, and hazardous building material wastes and universal waste will be disposed of appropriately offsite, in accordance with the applicable regulatory guidelines cited in **Section 4**.

9. REFERENCES

Credere, February 2025, Phase I Environmental Site Assessment, A-1 Deli, 88-92 Merrimack Street, Haverhill, Massachusetts, for Merrimack Valley Planning Commission EPA Brownfields Assessment Program.

Credere, July 2025, Pre-Renovation Hazardous Building Materials Survey, A-1 Deli, 88-92 Merrimack Street, Haverhill, Massachusetts, for Merrimack Valley Planning Commission EPA Brownfields Assessment Program.

FIGURES

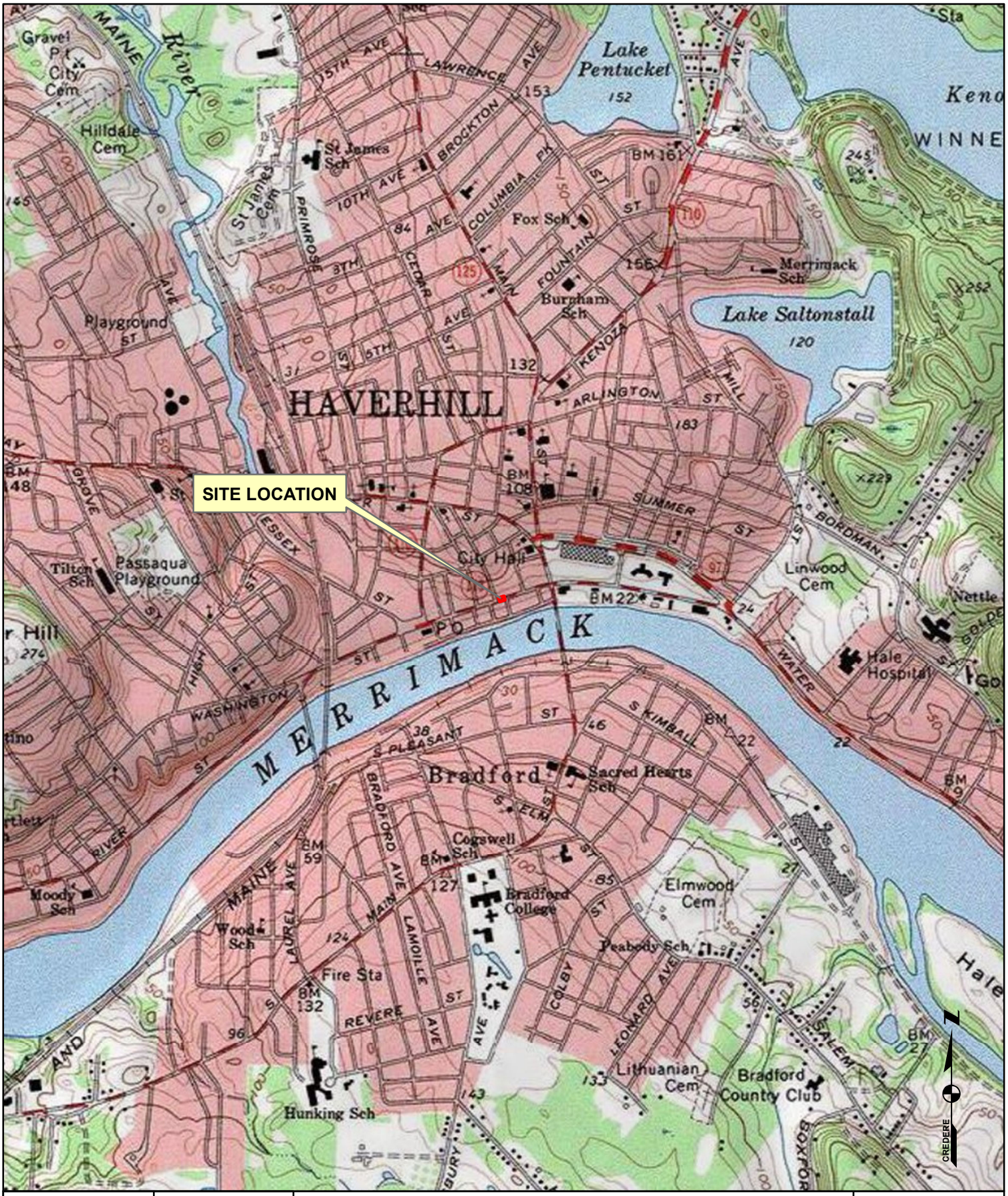

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FIGURE 1
SITE LOCATION PLAN

A-1 DELI
88-92 MERRIMACK STREET
HAVERHILL, MASSACHUSETTS

1,000 0 2,000 Feet

1 inch = 2,000 feet

HAVERHILL

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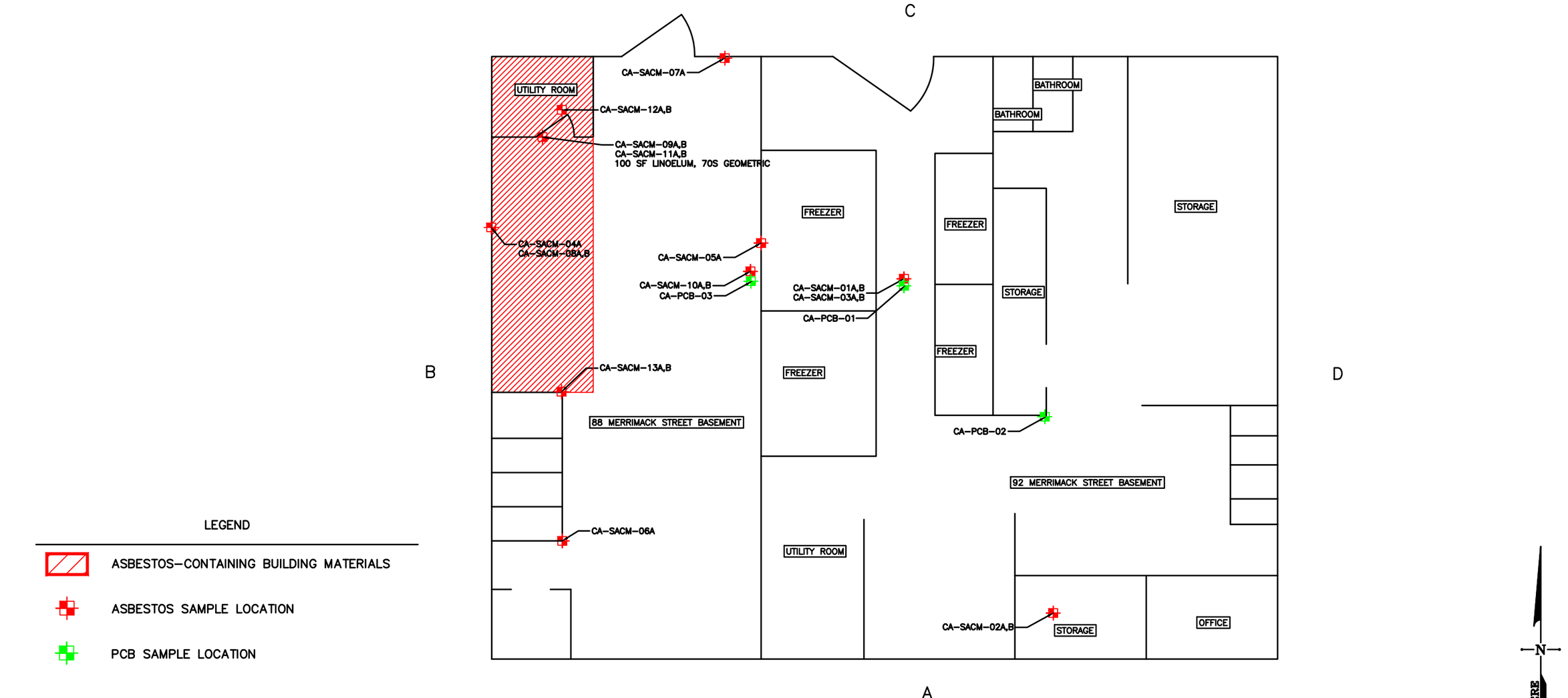
FIGURE 2
DETAILED SITE PLAN

A-1 DELI
88-92 MERRIMACK STREET
HAVERHILL, MASSACHUSETTS

- SITE BOUNDARY
- PARCEL BOUNDARIES
- FLOOR DRAIN
- 1 FOOT ELEVATION CONTOURS
- PRESUMED GROUNDWATER FLOW

NOTES:
EXISTING CONDITIONS AND FEATURES SHOWN ON THIS PLAN ARE APPROXIMATE AND ARE BASED ON INFORMATION OBTAINED FROM THE CITY OF HAVERHILL ONLINE GIS DATA, MASSACHUSETTS GIS PARCEL LAYER, ESRI ORTHO PHOTOS, AND FIELD WORK PERFORMED ON JANUARY 22, 2025.



LEGEND

- ASBESTOS–CONTAINING BUILDING MATERIALS
- ASBESTOS SAMPLE LOCATION
- PCB SAMPLE LOCATION

NOTES:

1. BUILDING FEATURES ARE BASED ON UNDATED FIRE ESCAPE FLOOR PLAN AND FIELD WORK ON JUNE 5, 2025.

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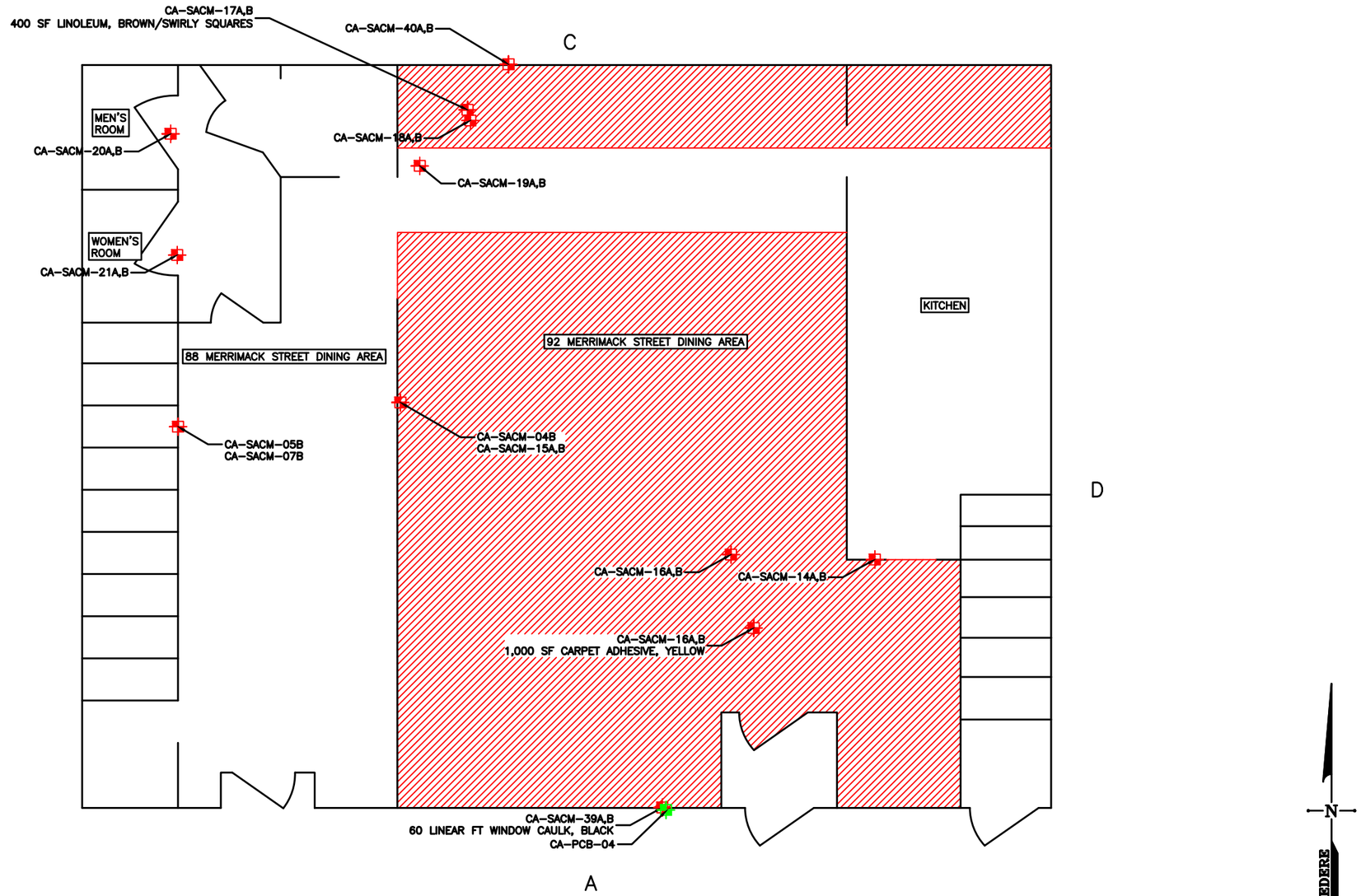
FIGURE #3
BASEMENT SAMPLE LOCATION MAP

A–1 DELI
88–92 MERRIMACK STREET
HAVERHILL, MASSACHUSETTS

NOT TO SCALE



LEGEND

- ASBESTOS-CONTAINING BUILDING MATERIALS
- ASBESTOS SAMPLE LOCATION
- PCB SAMPLE LOCATION

NOTES:

1. BUILDING FEATURES ARE BASED ON UNDATED FIRE ESCAPE FLOOR PLAN AND FIELD WORK ON JUNE 5, 2025.

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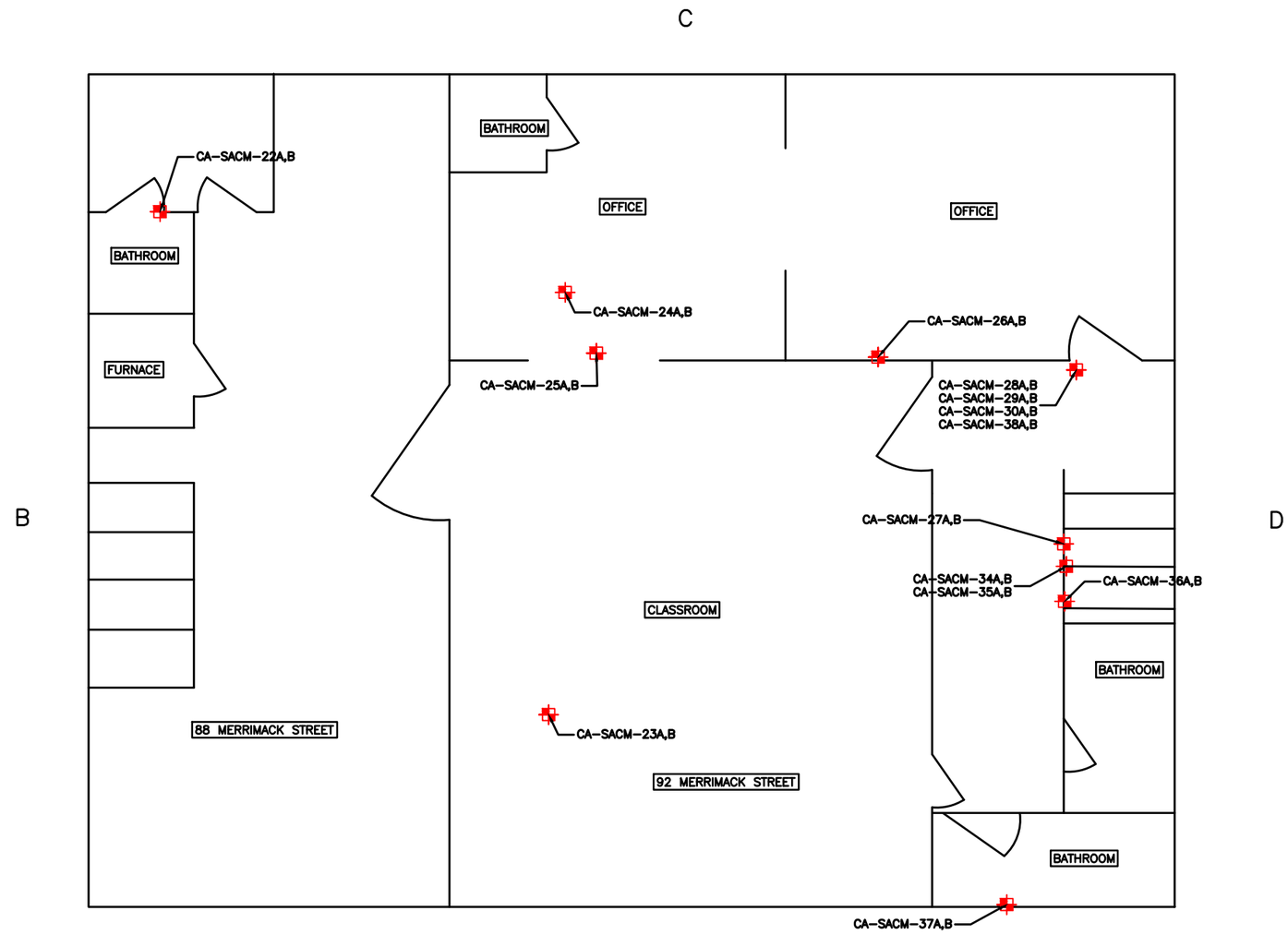
FIGURE # 4
FIRST FLOOR SAMPLE LOCATION MAP

A-1 DELI
88-92 MERRIMACK STREET
HAVERHILL, MASSACHUSETTS

NOT TO SCALE



LEGEND

- ASBESTOS-CONTAINING BUILDING MATERIALS
- ASBESTOS SAMPLE LOCATION
- PCB SAMPLE LOCATION

N

CREDERE

NOTES:

1. BUILDING FEATURES ARE BASED ON UNDATED FIRE ESCAPE FLOOR PLAN AND FIELD WORK ON JUNE 5, 2025.

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FIGURE # 5
SECOND FLOOR SAMPLE LOCATION MAP

A-1 DELI
88-92 MERRIMACK STREET
HAVERHILL, MASSACHUSETTS

NOT TO SCALE