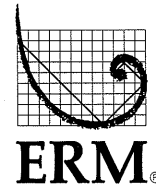


399 Boylston Street, 6<sup>th</sup> floor  
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9 September 2004  
Reference: 0010686

Mr. Benson R. Gould  
CMG Environmental, Inc.  
600 Charlton Street  
Southbridge, MA 01550



Re: Response to Public Comments  
Draft Immediate Response Action (IRA) Completion Report  
Former Raytheon Facility  
430 Boston Post Road  
Wayland, Massachusetts (the "Site")  
RTN 3-13302; Tier IB Permit No. 133939

Dear Mr. Gould:

On behalf of Raytheon Company (Raytheon), Environmental Resources Management (ERM) has prepared this letter providing responses to comments prepared by CMG Environmental, Inc. (CMG), consultant to the Town of Wayland, regarding the Draft Immediate Response Action (IRA) Completion Report, dated 20 July 2004. CMG's comment letter, dated 19 August 2004, contains four comments. This response letter includes relevant portions of each comment in italics and responses in plain text.

**CMG's Comments:**

I) *Wayland has only one significant concern regarding completion of the ongoing IRA: we have not yet seen any documentation from Raytheon or ERM to confirm no Imminent Hazard (IH) condition currently exists at the former contaminated sediment stockpile area of the Site due to the presence of arsenic, chromium, or polychlorinated biphenyls (PCBs) in surficial soils. Section 310 CMR 40.0321 (2)(b) of the MCP defines conditions that would constitute an IH, including:*

- *Contamination in surficial soil (within upper 12 inches) by arsenic greater than 40 mg/Kg, total chromium greater than 200 mg/Kg, or PCBs greater than 10 mg/Kg;*
- *Contaminated soil is located within 500 feet of a residence, school, playground, recreation area, or park; and*

- *There is no physical barrier to access contaminated soil such as fencing or paving.*

*The second and third conditions (location within 500 feet of recreation area and no physical barrier present) are certainly true at this portion of the Site now that ERM has removed the stockpile area pavement. The Town requests that Raytheon provide documentation in your final IRA Completion Report that you have conducted an IH evaluation in accordance with 310 CMR 40.0421(2) and 40.0950, and definitively state whether or not an IH condition currently exists at the Site.*

Raytheon understands the Town's concerns regarding a possible Imminent Hazard (IH) condition at the Site. Raytheon and ERM assure the town that existing data indicate that an IH condition does not exist in Site soil below either the wetland stockpile area or the gravel access roads.

ERM collected closure soil samples from 26 sampling grids (20 x 20 ft spacing) in the wetland stockpile area and from eight sampling grids (20 x 20 ft spacing) along the gravel access roadway (Figure 1) to evaluate the potential impact to these areas resulting from wetland sediment excavation activities. The soil analytical results (Table 1) from these soil closure samples indicate that there are no exceedances of the IH criteria set forth in 310 CMR 40.0421(2) in these areas.

*II) There is a fundamental dilemma with the IRA conducted for release tracking number (RTN) 3-13302. The trigger for conducting this IRA was the need to 'abate, prevent, or eliminate an Imminent Hazard to the environment' per 310 CMR 40.0411(1)(a). However, as documented in ERM's June 26, 2000 written IRA Plan, subsequent IRA Status Reports, and now the draft IRA Completion Report, the only IRA activity specifically conducted for RTN 3-13302 was assessment.*

*By now all interested parties should be well aware that between October 2003 and February 2004 Raytheon conducted extensive remediation via excavation of contaminated sediment from approximately 1.8 acres of wetland at the Site. These activities occurred under the overlapping jurisdictions of the U.S. EPA (per the September 10, 2003 "Application for Risk-Based Disposal Approval"); DEP (per the December 30, 2002 "Phase IV Remedy Implementation Plan"); and the Wayland Conservation Commission (per Order of Conditions 322-553, issued September 26, 2003). Remediation in the Site wetlands appears to have successfully eliminated the observed IH condition of stunted vegetation through its removal, along with associated contaminated wetland soils and sediment.*

*Therefore, the IRA condition that prompted two-hour notification (which DEP*

*initially identified as RTN 3-19482, and Raytheon subsequently linked to the primary RTN 3-13302) is no longer present at the Site, as a result of 'Comprehensive Response Actions' (to use MCP terminology), while the only documented IRA activity was assessment. Thus some confusion remains regarding which MCP terminology is more appropriate to label the remediation activities Raytheon and ERM recently completed. Nevertheless, Wayland is relieved that Raytheon has finally addressed and corrected this long-standing environmental problem.*

Raytheon and ERM are also pleased that the wetland soil excavation activities conducted as Phase IV Comprehensive Response Actions in accordance with 310 CMR 40.0870 and the Phase IV Remedy Implementation Plan, dated 27 December 2002 are successfully completed. The results of Phase IV activities will be presented in the Phase IV Completion Report, which is currently being prepared.

However, Raytheon and ERM disagree with the Town's belief that the trigger for conducting the IRA was the need to 'abate, prevent, or eliminate an IH to the environment' per 310 CMR 40.0411(1)(a).

On behalf of Raytheon, ERM submitted a Release Notification Form, IH Evaluation, and Immediate Response Action Plan (IRA Plan) to the Massachusetts Department of Environmental Protection (Department) on 26 June 2000 in response to the correlation of areas of sediment impact with the results of vegetative mapping and analysis of plant tissue which suggested the potential for an IH condition.

ERM completed an IH Evaluation which determined that:

- conditions at the disposal Site do not pose a potential IH to human health;
- conditions at the disposal Site do not pose a potential IH to safety; and
- conditions at the disposal Site pose a potential IH to the environment.

Therefore, the IH condition was specific to the evidence of stressed biota associated with historic releases at the Site. Based on the finding of an IH, an assessment only IRA was implemented at the Site in accordance with 310 CMR 40.0410.

The IRA Plan, Section D, indicates that Raytheon and ERM verbally notified the Department of the potential IH condition, pursuant to

40.0321, on 26 April 2000 and agreed to conduct an assessment only IRA pursuant to 310 CMR 40.0412. On 4 May 2000, Tim Boyle of the Department verbally authorized the IRA to include continued assessment of the nature and extent of impact in the wetlands and further evaluation of potential risks to human health and the environment consistent with the Phase II Scope of Work, dated 27 February 1998. The IRA Plan, Section F and G, also indicate that the IRA was implemented solely for the assessment of the wetland sediments and did not allow for sediment to be excavated, collected, stored, treated or re-used at the Site as part of the IRA.

*(III) Pursuant to 310 CMR 40.0427(6), DEP does not consider an IRA complete "until all stockpiled/stored Remediation Waste generated as a result of the [IRA] is removed from the site" (with certain exceptions). The Town is concerned that there is no documentation of remediation waste disposal in the draft IRA Completion Report. ERM does state that on page 5 that "documentation for [remediation waste] disposal activities will be provided under the Phase IV completion report." Wayland requests that in your final IRA Completion Report, Raytheon provide at least a summary of the total amount of remediation waste generated, the dates of generation, the disposal location(s), and dates of off-Site transport.*

As previously discussed the IRA was implemented solely for the assessment of stressed biota associated with historic releases at the Site. No soil was excavated, stockpiled, or stored at the Site as part of the IRA activities. Therefore, ERM does not believe it is necessary to include information on the soil removal activities conducted as part of Comprehensive Response Actions in the IRA Completion Report.

ERM has included a table summarizing the amount of remediation waste generated, the dates of generation, the disposal location(s), and dates of off-Site transport (Table 2). This information will also be included in the Phase IV Completion Report, which is currently being prepared.

*IV) The Town is concerned that Raytheon not close out the Site IRA prematurely. According to the most recent (July 30, 2004) ERM "Inspection Report" for the wetlands remediation, there is still a small amount of follow-up excavation yet to complete to address residual polynuclear aromatic hydrocarbons present above the RCS-1 reportable concentrations. ERM had not conducted this follow-up excavation as of August 12, 2004. Wayland believes that Raytheon should not submit the final IRA Completion Report to DEP until you have received laboratory results documenting that no significant contamination remains at the Site in any way attributable to the IH condition of stunted wetlands vegetation.*

Raytheon and ERM agree with the Town that the IRA not be closed out prematurely. However, as discussed in previous comments, the IRA was solely for the assessment of stressed biota associated with historic releases at the Site and should be closed at this time.

As indicated in the Inspection Report Number 14, dated 30 July 2004, composite soil closure samples collected from two grid cells (i.e., one from the wetland stockpile area and one from the gravel access roadway) contained concentrations exceeding RCS-1 Reportable Concentrations (Figure 1). These soil samples are as follows:

- GRA-5: RCS-1 exceedances for benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, and indeno(1,2,3-cd)pyrene.
- SPA-2: RCS-1 exceedance of benzo(b)fluoranthene.

On 12 August 2004 ERM collected one additional composite soil sample (from 6 to 8 inches below grade) from each of these grid cells to determine the vertical extent of the RCS-1 exceedances. Neither of these soil samples contained concentrations of metals, polynuclear aromatic hydrocarbons (PAHs), or polychlorinated biphenyls (PCBs) above RCS-1 Reportable Concentrations (Table 1).

On 27 August 2004, ERM excavated soil to a depth of six inches from these two grid cell (GRA-5 and SPA-2). The excavation of this soil was part of the Comprehensive Response Actions being conducted under the Phase IV Remedy Implementation Plan, dated 27 December 2002. The results of Phase IV activities will be presented in the Phase IV Completion Report, which is currently being prepared.



**TABLES**

**Table 1**  
**Access Road and Staging Area Closure Sample Results**  
**430 Boston Post Road**  
**Former Raytheon Facility**  
**Wayland, Massachusetts**

Sample I.D. Date Sampled	MCP Standard S-1/GW-1	GRA-1 12-Jul-04	GRA-2 12-Jul-04	GRA-3 12-Jul-04	GRA-4 12-Jul-04	GRA-5 12-Jul-04	GRA-5 12-Aug-04	GRA-6 12-Jul-04	GRA-7 12-Jul-04	GRA-8 12-Jul-04
<b>Metals (total) - Inorganics (mg/kg)</b>										
Arsenic	30	NA	NA	NA	23	7.4	7.1	6.4	6.3	4.9
Chromium	1,000				11	15	8.4	10	12	11
Copper	NS				20	29	13	21	19	21
Lead	30				14	24	8.9	15	24	12
<b>PAH - Organics (µg/kg)</b>										
Acenaphthene	20,000	NA	NA	NA	175	175	7	175	175	185
Acenaphthylene	100,000				175	175	17	175	175	185
Anthracene	1,000,000				175	175	28	175	175	185
Benzo[a]anthracene	700				175	1,100	180	175	175	185
Benzo[a]pyrene	700				420	1,500	260	430	400	185
Benzo[b]fluoranthene	700				500	2,200	300	440	430	185
Benzo[ghi]perylene	1,000,000				400	1,500	250	550	430	185
Benzo[k]fluoranthene	7,000				410	1,300	280	440	360	185
Chrysene	7,000				470	1,800	280	490	430	185
Dibenzo[a,h]anthracene	700				175	175	56	175	175	185
Fluoranthene	1,000,000				770	3,200	470	870	760	185
Fluorene	400,000				175	175	7	175	175	185
Indeno[1,2,3-cd]pyrene	700				175	1,300	240	370	175	185
Naphthalene	4,000				175	175	7	175	175	185
Phenanthrene	700,000				175	1,300	140	175	175	185
Pyrene	700,000				640	2,600	400	750	680	185
2-Chloronaphthalene	NS				175	175	7	175	175	185
2-Methylnaphthalene	4,000				175	175	7	175	175	185
<b>Total PAHs</b>	<b>4,945,500</b>				<b>5,535</b>	<b>19,200</b>	<b>2,936</b>	<b>6,090</b>	<b>5,415</b>	<b>3,330</b>
<b>PCBs - Organics (µg/kg)</b>										
Aroclor® 1221		17.6	17.6	21.1	17.6	17.6	13	17.4	17.4	18.5
Aroclor® 1232		17.6	17.6	21.1	17.6	17.6	13	17.4	17.4	18.5
Aroclor® 1242/1016		17.6	17.6	21.1	17.6	17.6	13	17.4	17.4	18.5
Aroclor® 1248		17.6	17.6	21.1	17.6	17.6	13	17.4	17.4	18.5
Aroclor® 1254		17.6	17.6	21.1	269	184	13	17.4	17.4	18.5
Aroclor® 1260		17.6	17.6	21.1	89.6	112	13	62.9	37.6	56.2
Aroclor® 1262		17.6	17.6	21.1	17.6	17.6	13	17.4	17.4	18.5
Aroclor® 1268		17.6	17.6	21.1	17.6	17.6	13	17.4	17.4	18.5
<b>Total PCBs</b>	<b>2,000</b>	<b>140.8</b>	<b>140.8</b>	<b>168.8</b>	<b>464.2</b>	<b>401.6</b>	<b>104</b>	<b>184.7</b>	<b>159.4</b>	<b>185.7</b>

Notes:  
NA = Not Analyzed  
Non-detects are listed as half the value of the detection limit.  
Metals and PAHs were only analyzed if PCBs were detected.  
Shaded cells denote exceedences of the listed MCP standard



**Table 1**  
**Access Road and Staging Area Closure Sample Results**  
**430 Boston Post Road**  
**Former Raytheon Facility**  
**Wayland, Massachusetts**

Sample I.D. Date Sampled	MCP Standard S-1/GW-1	SPA-1 09-Jul-04	SPA-2 09-Jul-04	SPA-2 12-Aug-04	SPA-3 09-Jul-04	SPA-4 09-Jul-04	SPA-5 09-Jul-04	SPA-6 09-Jul-04	SPA-7 13-Jul-04	SPA-8 13-Jul-04	SPA-9 13-Jul-04
<b>Metals (total) - Inorganics (mg/kg)</b>					NA					NA	
Arsenic	30	6.3	6.2	5.9		5.1	5.8	7.2	6.3		4.4
Chromium	1,000	41	14	8		14	23	40	41		12
Copper	NS	38	17	12		17	25	41	42		21
Lead	30	12	18	11		17	8.7	20	17		7.8
<b>PAH - Organics (µg/kg)</b>					NA					NA	
Acenaphthene	20,000	185	185	45		185	185	190	175		175
Acenaphthylene	100,000	185	185	120		185	185	190	175		175
Anthracene	1,000,000	185	185	210		185	185	190	175		175
Benzo[a]anthracene	700	185	530	640		610	185	190	175		175
Benzo[a]pyrene	700	185	670	480		590	185	190	175		175
Benzo[b]fluoranthene	700	185	770	600		690	185	190	175		175
Benzo[ghi]perylene	1,000,000	185	620	300		480	185	190	175		175
Benzo[k]fluoranthene	7,000	185	710	520		610	185	190	175		175
Chrysene	7,000	185	760	630		710	185	190	175		175
Dibenzo[a,h]anthracene	700	185	185	100		185	185	190	175		175
Fluoranthene	1,000,000	185	1,300	1,100		1,300	185	390	490		175
Fluorene	400,000	185	185	50		185	185	190	175		175
Indeno[1,2,3-cd]pyrene	700	185	560	340		450	185	190	175		175
Naphthalene	4,000	185	185	7		185	185	190	175		175
Phenanthrene	700,000	185	420	380		580	185	190	175		175
Pyrene	700,000	185	1,100	1,000		1,100	185	190	430		175
2-Chloronaphthalene	NS	185	185	7		185	185	190	175		175
2-Methylnaphthalene	4,000	185	185	7		185	185	190	175		175
<b>Total PAHs</b>	<b>4,945,500</b>	<b>3,330</b>	<b>8,920</b>	<b>6,536</b>		<b>8,600</b>	<b>3,330</b>	<b>3,620</b>	<b>3,720</b>		<b>3,150</b>
<b>PCBs - Organics (µg/kg)</b>											
Aroclor® 1221		18.3	18.3	13.6	18.3	18.7	18.3	18.9	17.8	17.4	17.4
Aroclor® 1232		18.3	18.3	13.6	18.3	18.7	18.3	18.9	17.8	17.4	17.4
Aroclor® 1242/1016		18.3	18.3	13.6	18.3	18.7	18.3	18.9	17.8	17.4	17.4
Aroclor® 1248		18.3	18.3	13.6	18.3	18.7	18.3	18.9	17.8	17.4	17.4
Aroclor® 1254		18.3	18.3	13.6	18.3	18.7	18.3	18.9	17.8	17.4	17.4
Aroclor® 1260		119	61.8	13.6	18.3	48.1	71.2	130	132	17.4	39.8
Aroclor® 1262		18.3	18.3	13.6	18.3	18.7	18.3	18.9	17.8	17.4	17.4
Aroclor® 1268		18.3	18.3	13.6	18.3	18.7	18.3	18.9	17.8	17.4	17.4
<b>Total PCBs</b>	<b>2,000</b>	<b>247.1</b>	<b>189.9</b>	<b>108.8</b>	<b>146.4</b>	<b>179</b>	<b>199.3</b>	<b>262.3</b>	<b>256.6</b>	<b>139.2</b>	<b>161.6</b>

Notes:  
NA = Not Analyzed  
Non-detects are listed as half the value of the detection limit.  
Metals and PAHs were only analyzed if PCBs were detected.  
Shaded cells denote exceedences of the listed MCP standard

**Table 1**  
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**430 Boston Post Road**  
**Former Raytheon Facility**  
**Wayland, Massachusetts**

Sample I.D.	MCP Standard	SPA-10	SPA-11	SPA-12	SPA-13	SPA-14	SPA-15	SPA-16	SPA-17	SPA-18
Date Sampled	S-1/GW-1	13-Jul-04	13-Jul-04	13-Jul-04	13-Jul-04	13-Jul-04	13-Jul-04	13-Jul-04	13-Jul-04	13-Jul-04
<b>Metals (total) - Inorganics (mg/kg)</b>		NA	NA	NA	NA	NA			NA	NA
Arsenic	30						5.0	4.1		
Chromium	1,000						21	17		
Copper	NS						22	29		
Lead	30						11	10		
<b>PAH - Organics (µg/kg)</b>		NA	NA	NA	NA	NA			NA	NA
Acenaphthene	20,000						180	180		
Acenaphthylene	100,000						180	180		
Anthracene	1,000,000						180	180		
Benzo[a]anthracene	700						180	180		
Benzo[a]pyrene	700						180	180		
Benzo[b]fluoranthene	700						180	180		
Benzo[ghi]perylene	1,000,000						180	180		
Benzo[k]fluoranthene	7,000						180	180		
Chrysene	7,000						180	180		
Dibenzo[a,h]anthracene	700						180	180		
Fluoranthene	1,000,000						180	180		
Fluorene	400,000						180	180		
Indeno[1,2,3-cd]pyrene	700						180	180		
Naphthalene	4,000						180	180		
Phenanthrene	700,000						180	180		
Pyrene	700,000						180	180		
2-Chloronaphthalene	NS						180	180		
2-Methylnaphthalene	4,000						180	180		
<b>Total PAHs</b>	<b>4,945,500</b>						<b>3,240</b>	<b>3,240</b>		
<b>PCBs - Organics (µg/kg)</b>										
Aroclor® 1221		17.6	17.9	17.6	17.9	17.6	18.1	17.9	17.6	17.6
Aroclor® 1232		17.6	17.9	17.6	17.9	17.6	18.1	17.9	17.6	17.6
Aroclor® 1242/1016		17.6	17.9	17.6	17.9	17.6	18.1	17.9	17.6	17.6
Aroclor® 1248		17.6	17.9	17.6	17.9	17.6	18.1	17.9	17.6	17.6
Aroclor® 1254		17.6	17.9	17.6	17.9	17.6	18.1	17.9	17.6	17.6
Aroclor® 1260		17.6	17.9	17.6	17.9	17.6	70.8	36.1	17.6	17.6
Aroclor® 1262		17.6	17.9	17.6	17.9	17.6	18.1	17.9	17.6	17.6
Aroclor® 1268		17.6	17.9	17.6	17.9	17.6	18.1	17.9	17.6	17.6
<b>Total PCBs</b>	<b>2,000</b>	<b>140.8</b>	<b>143.2</b>	<b>140.8</b>	<b>143.2</b>	<b>140.8</b>	<b>197.5</b>	<b>161.4</b>	<b>140.8</b>	<b>140.8</b>

Notes:  
NA = Not Analyzed  
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Metals and PAHs were only analyzed if PCBs were detected.  
Shaded cells denote exceedences of the listed MCP standard

**Table 1**  
**Access Road and Staging Area Closure Sample Results**  
**430 Boston Post Road**  
**Former Raytheon Facility**  
**Wayland, Massachusetts**

Sample I.D.	MCP Standard	SPA-19	SPA-20	SPA-21	SPA-22	SPA-23	SPA-24	SPA-25	SPA-26	Sample Average
Date Sampled	S-1/GW-1	13-Jul-04	13-Jul-04	13-Jul-04	13-Jul-04	13-Jul-04	13-Jul-04	13-Jul-04	13-Jul-04	
<b>Metals (total) - Inorganics (mg/kg)</b>		NA	NA	NA	NA	NA		NA		
Arsenic	30						4.2		4.5	7
Chromium	1,000						15		13	19
Copper	NS						28		14	24
Lead	30						11		8.6	13
<b>PAH - Organics (µg/kg)</b>		NA	NA	NA	NA	NA		NA		
Acenaphthene	20,000						175		175	160
Acenaphthylene	100,000						175		175	166
Anthracene	1,000,000						175		175	172
Benzo[a]anthracene	700						175		175	235
Benzo[a]pyrene	700						175		175	274
Benzo[b]fluoranthene	700						175		175	298
Benzo[ghi]perylene	1,000,000						175		175	263
Benzo[k]fluoranthene	7,000						175		175	277
Chrysene	7,000						175		175	301
Dibenzo[a,h]anthracene	700						175		175	167
Fluoranthene	1,000,000						380		175	487
Fluorene	400,000						175		175	161
Indeno[1,2,3-cd]pyrene	700						175		175	222
Naphthalene	4,000						175		175	158
Phenanthrene	700,000						175		175	214
Pyrene	700,000						175		175	414
2-Chloronaphthalene	NS						175		175	158
2-Methylnaphthalene	4,000						175		175	158
<b>Total PAHs</b>	<b>4,945,500</b>						<b>3,355</b>		<b>3,150</b>	
<b>PCBs - Organics (µg/kg)</b>										
Aroclor® 1221		17.8	17.4	17.2	17.2	17.0	17.6	17.8	17.6	17.6
Aroclor® 1232		17.8	17.4	17.2	17.2	17.0	17.6	17.8	17.6	17.6
Aroclor® 1242/1016		17.8	17.4	17.2	17.2	17.0	17.6	17.8	17.6	17.6
Aroclor® 1248		17.8	17.4	17.2	17.2	17.0	17.6	17.8	17.6	17.6
Aroclor® 1254		17.8	17.4	17.2	17.2	17.0	17.6	17.8	17.6	25.0
Aroclor® 1260		17.8	17.4	17.2	17.2	17.0	63.5	17.8	59.1	40.1
Aroclor® 1262		17.8	17.4	17.2	17.2	17.0	17.6	17.8	17.6	17.6
Aroclor® 1268		17.8	17.4	17.2	17.2	17.0	17.6	17.8	17.6	17.6
<b>Total PCBs</b>	<b>2,000</b>	<b>142.4</b>	<b>139.2</b>	<b>137.6</b>	<b>137.6</b>	<b>136</b>	<b>186.7</b>	<b>142.4</b>	<b>182.3</b>	<b>170.7</b>

Notes:  
NA = Not Analyzed  
Non-detects are listed as half the value of the detection limit.  
Metals and PAHs were only analyzed if PCBs were detected.  
Shaded cells denote exceedences of the listed MCP standard

**Table 2**  
**Summary of Biweekly Remedial Activities and Waste Management**  
**Former Raytheon Facility**  
**430 Boston Post Road**  
**Wayland, Massachusetts**

Inspection Report Period	Volume of Soil Excavated from Wetland (yd <sup>3</sup> )			Volume of Ice Excavated from Wetland (yd <sup>3</sup> ) <sup>1</sup>	Volume of Soil/Sediment Transported Offsite (yd <sup>3</sup> ) <sup>2</sup>	Volume of Clean Soil Backfilled (yd <sup>3</sup> ) <sup>3</sup>	Volume of Water Treated/Discharged (gal)	Volume of Asphalt Transported Offsite (yd <sup>3</sup> ) <sup>4</sup>	Volume of Gravel Sub-Base Transported Offsite (yd <sup>3</sup> ) <sup>4</sup>	Volume of Gravel Haul Road Transported Offsite (yd <sup>3</sup> ) <sup>5</sup>
	Area A	Area B	Area C							
#1: 14-Oct to 24-Oct 2003	0	800	0	0	0	0	0	0	0	0
#2: 25-Oct to 7-Nov 2003	0	0	350	0	1,100	0	0	0	0	0
#3: 8-Nov to 21-Nov 2003	0	0	2,230	0	96	0	689,000	0	0	0
#4: 22-Nov to 5-Dec 2003	0	0	835	0	128	0	1,229,500	0	0	0
#5: 6-Dec to 19-Dec 2003	0	0	1,485	0	1,700	0	540,000	0	0	0
#6: 20-Dec to 2-Jan 2004	0	0	0	0	1,800	0	0	0	0	0
#7: 3-Jan to 16-Jan 2004	0	0	0	0	525	0	0	0	0	0
#8: 17-Jan to 30-Jan 2004	175	0	1,901	1,600	0	0	30,000	0	0	0
#9: 31-Jan to 13-Feb 2004	0	0	300	0	0	7,539	1,307,000	0	0	0
#10: 14-Feb to 27-Feb 2004	0	0	0	0	0	3,782	0	0	0	0
#11: 7-June to 18-June 2004	0	0	0	0	240	390	0	0	0	0
#12: 21-June to 2-July 2004	0	0	0	0	3,606	0	0	0	0	0
#13: 5-July to July 16 2004	0	0	0	0	96	0	0	308	132	308
Sub-Total	175	800	7,101							
Total		8,076		1,600	9,291	11,711	3,795,500	308	132	308

Notes:

1. Includes approximately 25% by volume excavated soil
2. Volume transported off site includes cement added to stabilize the soil (approximately 10-15% by weight), approximately 50 yd<sup>3</sup> of wood debris, soil scraped from the bottom of the "ice stockpile", plastic sheeting and discarded PPE.  
Sediment/Soil transported to Clean Harbors Lone Mountain Storage Facility, Waynoka, Oklahoma.
3. The 390 yd<sup>3</sup> of soil delivered between 7 June and 18 June 2004 were used for upland resoiling of access roads
4. Asphalt and Gravel Sub-Base transported to AMREC Recycling Facility, Charlton, Massachusetts.
5. Gravel Haul Road transported to Waste Management Facility, Rochester, New Hampshire.

***FIGURES***

