

**Environmental
Resources
Management**

399 Boylston Street, 6th Floor
Boston, Massachusetts 02116
(617) 267-8377
(617) 267-6447 (fax)

<http://www.erm.com>

FILE COPY

25 April 2001
Reference: 143.53

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup
Northeast Regional Office
205 A Lowell Street
Wilmington, MA 01887



RE: Immediate Response Action – Six-Month Status Report
Former Raytheon Facility
430 Boston Post Road
Wayland, Massachusetts
Permit No. 133939

Dear Sir or Madam:

On behalf of Raytheon Company (Raytheon), Environmental Resources Management (ERM) is submitting an Immediate Response Action - Six-Month Status Report for the site located at 430 Boston Post Road, Wayland, Massachusetts. This submittal was prepared in accordance with the requirements of the Massachusetts Contingency Plan (MCP), 310 CMR 40.0000.

BACKGROUND

In accordance with the requirements of the Massachusetts Contingency Plan (MCP), 310 CMR 40.0480, Environmental Resources Management (ERM) submitted a Phase I-Initial Site Investigation (Phase I) report for the site to the Massachusetts Department of Environmental Protection (DEP or Department) in July 1996 and a Tier Classification filing in January 1997. The Department issued Raytheon a Tier IB Permit, effective 21 May 1997. A Phase II-Comprehensive Site Assessment (Phase II) of the site is currently in progress.

Recent results of an on going Phase II – Comprehensive Site Assessment have linked a suspected area of stunted growth to elevated levels of metals, polychlorinated biphenyls (PCBs) and polynuclear aromatic hydrocarbons (PAHs). The reduced stem count of biota in this area indicates that a potential imminent hazard may exist, based on the criteria set forth in 310 CMR 40.0955(3). The potential Imminent Hazard



Condition was reported to the Northeast Regional Office on 26 April 2000.

An IRA Plan was submitted to the Department on 26 June 2000 following the imminent hazard determination. The Imminent Hazard Evaluation determined that the site did not pose an Imminent Hazard to human health or safety, but posed a potential Imminent Hazard to the environment. The objective of the IRA plan is to continue to assess site conditions according to the Phase II Scope of Work and addendum in the wetlands and to delineate the extent of impact to sediments and surface water, and assess risk to human health and the environment.

Pursuant to 310 CMR 40.0530, a Major Permit Modification Application was filed on 25 May 2000 to upgrade the site tier classification and permit from IB to IA following the re-evaluation of the site Numerical Ranking Score (NRS). On 7 September 2000, Raytheon received a Notice of Proposed Permit Decision from the DEP. The department determined, based its review of the Major Permit Modification Application that a new Tier IB permit would be issued with special conditions.

A 120-day IRA Status Report, dated 26 October 2000, was submitted to the Department. This report represents the second status report for the IRA.

STATUS OF ASSESSMENT

ERM is continuing to prepare the Phase II Comprehensive Site Assessment report. No field activities or sampling have been conducted during this time period. Assessment activities have been limited to the evaluation of potential risk at the site including conducting an ecological risk characterization and human health risk characterization. Non-assessment activities include the initiation of the Public Involvement Process and public meetings.

SIGNIFICANT NEW SITE INFORMATION

No new site information or data has been gathered since the submittal of the IRA Plan.

MANAGEMENT OF REMEDIAL WASTE

No remediation waste has been generated on-site.

REMEDIAL SYSTEMS DATA

No remedial systems are operated on-site.

OTHER INFORMATION

A new Tier IB permit for the site was issued in December 2000 and instituted the following new deadlines for outstanding MCP requirements:

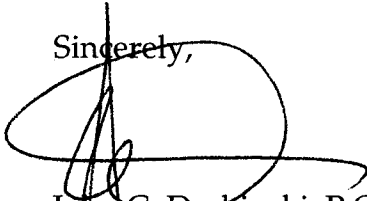
- By 28 November 2001, submittal of the Phase II Comprehensive Site Assessment (Phase II) report and the Phase III Remedial Action Plan (Phase III)
- By 28 May 2002, submittal of the Phase IV Remedy Implementation Plan (Phase IV RIP)

In addition, the permit required that a fence be installed around the wetland. ERM intends to install the fence once flood conditions subside in the Sudbury River and all appropriate approvals have been obtained.

LSP OPINION

It is the opinion of the LSP that this IRA is being conducted in conformance with the IRA Plan.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to be 'JD' or similar, written over the word 'Sincerely,'.

John C. Drobinski, P.G., LSP
Principal-in-Charge

A handwritten signature in black ink, appearing to be 'J. McTigue', written over the name 'John W. McTigue, P.G., LSP'.

John W. McTigue, P.G., LSP
Project Manager

rj

cc: Ronald C. Slager, Jr., Raytheon Company



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-105

IMMEDIATE RESPONSE ACTION (IRA)
TRANSMITTAL FORM

Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart

Release Tracking

3

19485

A. RELEASE OR THREAT OF RELEASE LOCATION:

Release Name: Former Raytheon Facility

Street: 430 Boston Post Road

Location Aid: _____

City/Town: Wayland

ZIP 01778-0000

☒ Check here if a Tier Classification Submittal has been provided to DEP for this Release Tracking Number.

☐ Check here if this location is Adequately Regulated, pursuant to 310 CMR 40.0110-0114

Specify Program: ☐ CERCLA ☐ HSWA Corrective Action ☐ Solid Waste Management ☐ RCRA State Program (21C Facilities)

Related Release Tracking Numbers That This IRA _____

B. THIS FORM IS BEING USED TO: (check all that apply)

☐ Submit an IRA Plan (complete Sections A, B, C, D, E, H, I, J and K).

☐ Check here if this IRA Plan is an update or modification of a previously approved written IRA Plan

☐ Submit an Imminent Hazard Evaluation (complete Sections A, B, C, F, H, I, J and K).

☒ Submit an IRA Status Report (complete Sections A, B, C, E, H, I, J and K).

☐ Submit a Request to Terminate an Active Remedial System and/or Terminate a Continuing Response Action(s) Taken to Address an Imminent Hazard (complete Sections A, B, C, D, E, H, I, J and K).

☐ Submit an IRA Completion Statement (complete Sections A, B, C, D, E, G, H, I, J and K).

You must attach all supporting documentation required for each use of form indicated, including copies of any Legal Notices and Notices to Public Officials required by 310 CMR 40.1400.

C. RELEASE OR THREAT OF RELEASE CONDITIONS THAT WARRANT

Identify Media and Receptors Affected: (check all that ☐ Air ☐ Groundwater ☒ Surface Water ☒ Sediments ☐ Soil
☒ Wetland ☐ Storm Drain ☐ Paved Surface ☐ Private Well ☐ Public Water Supply ☒ Zone 2 ☐ Residence
☐ School ☐ Unknown ☐ Other Specify _____

Identify Conditions That Require IRA, Pursuant to 310 CMR 40.0412: (check all that apply) ☒ 2 Hour Reporting Condition(s)

☐ 72 Hour Reporting Condition(s) ☐ Substantial Release Migration ☐ Other Condition(s)

Describe Evidence of stressed biota attributable to a historic release at the disposal site.

Identify Oils and Hazardous Materials Released: (check all that ☒ Oils ☐ Unidentified Solvents ☒ Heavy Metals
☒ Others Specify: PCBs

D. DESCRIPTION OF RESPONSE ACTIONS: (check all that

☒ Assessment and/or Monitoring Only

☐ Excavation of Contaminated Soils

☐ Re-use, Recycling or Treatment

☐ On Site ☐ Off Site Est. Vol.: _____ cubic yards

Describe _____

☐ Store ☐ On Site ☐ Off Site Est. Vol.: _____ cubic yards

☐ Landfill ☐ Cover ☐ Disposal Est. Vol.: _____ cubic yards

☐ Removal of Drums, Tanks or Containers

Describe: _____

☐ Deployment of Absorbent or Containment Materials

☐ Temporary Covers or Caps

☐ Bioremediation

☐ Soil Vapor Extraction

☐ Structure Venting System

☐ Product or NAPL Recovery

☐ Groundwater Treatment Systems

☐ Air Sparging

☐ Temporary Water Supplies

SECTION D IS CONTINUED ON THE NEXT PAGE.



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-105

IMMEDIATE RESPONSE ACTION (IRA)

TRANSMITTAL FORM

Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart

Release Tracking

3

19485

D. DESCRIPTION OF RESPONSE ACTIONS (continued):

- ☐ Removal of Other Contaminated Media
Specify Type and _____
- ☐ Temporary Evacuation or Relocation of Residents
- ☐ Other Response Actions Describe _____
- ☐ Fencing and Sign Posting
- ☐ Check here if this IRA involves the use of Innovative Technologies (DEP is interested in using this information to aid in creating an Innovative Technologies Clearinghouse).
Describe _____

E. TRANSPORT OF REMEDIATION WASTE: (if Remediation Waste has been sent to an off-site facility, answer the following)

Name of _____

Town and _____

Quantity of Remediation Waste Transported to _____

F. IMMINENT HAZARD EVALUATION SUMMARY: (check one of the following)

- ☐ Based upon an evaluation, an Imminent Hazard exists in connection with this Release or Threat of Release.
- ☐ Based upon an evaluation, an Imminent Hazard does not exist in connection with this Release or Threat of Release.
- ☐ Based upon an evaluation, it is unknown whether an Imminent Hazard exists in connection with this Release or Threat of Release, and further assessment activities will be undertaken.
- ☐ Based upon an evaluation, it is unknown whether an Imminent Hazard exists in connection with this Release or Threat of Release. However, response actions will address those conditions that could pose an Imminent Hazard.

G. IRA COMPLETION STATEMENT:

- ☐ Check here if future response actions addressing this Release or Threat of Release will be conducted as part of the Response Actions planned for a Site that has already been Tier Classified under a different Release Tracking Number, or a Site that is identified on the Transition List as described in 310 CMR 40.0600 (i. e., a Transition Site, which includes Sites with approved Waivers). These additional response actions must occur according to the deadlines applicable to the earlier Release Tracking Number (i. e., Site ID Number).

State Release Tracking Number (i. e., Site ID Number) of Tier Classified Site or Transition _____

If any Remediation Waste will be stored, treated, managed, recycled or reused at the site following submission of the IRA Completion Statement, you must submit either a Release Abatement Measure (RAM) Plan or a Phase IV Remedy Implementation Plan, along with the appropriate transmittal form, as an attachment to the IRA Completion Statement.

H. LSP OPINION:

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and (iii) the provisions of 309 CMR 4.03(5), to the best of my knowledge, information and belief,

> if Section B of this form indicates that an Immediate Response Action Plan is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that an Imminent Hazard Evaluation is being submitted, this Imminent Hazard Evaluation was developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and the assessment activity(ies) undertaken to support this Imminent Hazard Evaluation complies(y) with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000;

> if Section B of this form indicates that an Immediate Response Status Report is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that an Immediate Response Action Completion Statement or a Request to Terminate an Active Remedial System and/or Terminate a Continuing Response Action(s) Taken to Address an Imminent Hazard is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal.

SECTION H IS CONTINUED ON THE NEXT PAGE.



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-105

Release Tracking

3 - 19485

IMMEDIATE RESPONSE ACTION (IRA)

TRANSMITTAL FORM Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

H. LSP Opinion (continued):

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

☐ Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.

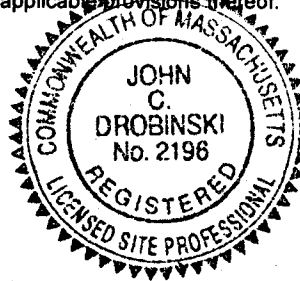
LSP Name: John C. Drobinski LSP #: 2196 Stamp:

Telephone: 617-267-8377 Ext.: _____

FAX: (optional) 617-267-6447

Signature: _____

Date: 2/25/01



I. PERSON UNDERTAKING IRA:

Name of Ravtheon Company

Name of Ronald C. Slager, Jr. Title: Restoration Project Manager

Street: 1001 Boston Post Road

City/Town: Marlborough State: MA ZIP Code: 01752-0000

Telephone: 508-490-1770 Ext.: _____ FAX: _____

☐ Check here if there has been a change in the person undertaking the IRA.

J. RELATIONSHIP TO RELEASE OR THREAT OF RELEASE OF PERSON UNDERTAKING IRA: (check one)

☒ RP or PRP Specify ☐ Owner ☐ Operator ☐ Generator ☐ Transporter Other RP or PRP: past operator

☐ Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)

☐ Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))

☐ Any Other Person Undertaking IRA Specify _____

K. CERTIFICATION OF PERSON UNDERTAKING IRA:

I, Ronald C. Slager, Jr., attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

By: Ronald C. Slager, Jr. Title: Restoration Project Manager
(signature)

For: Ravtheon Company Date: 4-25-01
(print name of person or entity recorded in Section I)

Enter address of the person providing certification, if different from address recorded in Section

Street: _____

City/Town: _____ State: _____ ZIP Code: _____

Telephone: _____ Ext. _____ FAX: _____

YOU MUST COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.