Environmental Resources Management

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

http://www.erm.com

30 October 2002
Reference: 143.65

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 #4
Former Raytheon Facility
430 Boston Post Road
Wayland, Massachusetts ("the Site")
Permit No. 133939

Dear Sir or Madam:

On behalf of Raytheon Company (Raytheon), Environmental Resources Management (ERM) is submitting an Immediate Response Action (IRA) Six-Month Status Report for the Site. 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 MCP, 310 CMR 40.0480, ERM submitted a Phase I-Initial Site Investigation (Phase I) report for the Site to the Massachusetts Department of Environmental Protection (DEP) in July 1996 and a Tier Classification filing in January 1997. The DEP issued Raytheon a Tier IB Permit, effective 21 May 1997. In accordance with the Public Involvement Plan (PIP) dated in 10 November 2000, the draft Phase II-Comprehensive Site Assessment (Phase II) and Phase III Remedial Site Investigation (Phase III) was submitted for Public Comment on 10 October 2001. A completed Phase II and III were submitted to DEP on 28 November 2001.

Results of the Phase II 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 indicated 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 DEP on 26 April 2000.

An IRA Plan was submitted to the DEP 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 Tier IB to Tier 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 DEP determined, based on its review of the Major Permit Modification Application, that a new Tier IB permit would be issued with special conditions. The Phase II Comprehensive Site Assessment and Phase III Remedial Action Plan were submitted to the DEP on 28 November 2002.

The first Six-month Status Report, dated 25 April 2001, was submitted to the DEP. This report represents the fourth status report for the IRA.

STATUS OF ASSESSMENT

Raytheon submitted a Scope of Work, dated 20 June 2002, to the DEP to conduct additional Site characterization activities to address concerns of the Public Involvement Plan (PIP) participants in the Town of Wayland. The results of the additional assessment activities will be documented in a Phase II/III Addendum Report. The Scope of Work includes the following tasks:

- Advance soil borings and install monitoring wells;
- Install monitoring wells in a portion of the wetland;
- Advance cone penetrometer (CPT) borings and install monitoring wells;
- Conduct soil oxidant demand tests;

- Conduct groundwater monitoring;
- Conduct waste characterization sampling at select sediment sampling locations;
- Conduct additional sampling of wetland soil/sediment; and
- Advance soil borings in upland adjacent to wetland boundary.

Tasks that address the impacts to the wetland that are addressed under the IRA include; installation of 3 monitoring well couplets in the resource area, advancement of 15 soil borings and installation of one shallow monitoring well in the upland adjacent to the wetland, and completion of additional soil sampling in the wetland.

NEW SITE INFORMATION

A summary of the groundwater, soil and sediment data are summarized in tables 1, 2 and 3 respectively. To date, the dioxin results for sediment samples collected within the wetland area have not been received from the laboratory. Copies of the laboratory analytical data are located in Appendix A. Figure 1 indicates the new sampling locations.

Arsenic was detected in groundwater at shallow monitoring wells in the wetland above GW-1 standards. The elevated arsenic concentrations may be attributable to naturally occurring reducing conditions in the wetland or to impacts of heavy metals in wetland sediment. ERM and Raytheon are continuing to investigate this issue. This data may constitute a 120-day reporting requirement under the MCP and Raytheon will comply with this condition if it is determined to be appropriate. Volatile organic compounds (VOCs), PCBs and PAHs were not detected above method detection limits.

Soil samples from upland borings and monitoring well installations were analyzed for VOCs, PAHs, and priority 13 metals. All analytes were detected below S-1 standards, except one soil sample in the upland. The sample (B-312) that exceeded the S-1 standard for arsenic was located in close proximity of pressure treated lumber. Soil samples from three addition soil borings installed in the vicinity of the B-312, confirmed that arsenic exceedance was a localized condition due to the presence of pressure treated lumber.

Sediment analytical results were compared to EPA sediment screening criteria. Data did not exceed screening criteria for VOCs, alcohols, glycols, aldehydes, boron, physiologically available cyanide, fluoride and nitrogen as ammonia. Waste characterization analysis did not exceed Toxic Characterization Leaching Procedure (TCLP) method detection limits for metals, semi-volatile organic compounds (sVOCs), pesticides, herbicides and VOCs.

MANAGEMENT OF REMEDIAL WASTE

No remediation waste has been generated on-Site.

REMEDIAL SYSTEMS DATA

No remedial systems are operated on-Site. Ongoing monitoring of an in situ chemical oxidation pilot study is being conducted as part of a Release Abatement Measure (RAM). A RAM Plan, dated 11 September 2001, a RAM 120-day Status Report, dated 31 January 2002 and a Six-month Status Report, dated 25 July 2002were submitted to the DEP to document pilot study activities. A RAM Plan Modification has been reviewed by the PIP participants and has been submitted to the DEP on 23 October 2002.

OTHER INFORMATION

The installed fence along the wetland boundary at the Site is regularly inspected and appears in good condition.

LSP OPINION

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

Sincerely,

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

Rachel Leary
Project Engineer

rbl

Attachment: Table 1 - Summary of Groundwater Analytical Results
Table 2 - Summary of Soil Analytical Results
Table 3 - Summary of Sediment Analytical Results
Figure 1 -Sampling Locations
BWSC Transmittal Form

cc: Edwin Madera, Raytheon Company
PIP Repository, Wayland Public Library
PIP Repository, Wayland Board of Health
Benson Gould, CMG Environmental
Paula Phillips, Congress Group Ventures
Bill Beck, H&A

Table 1
Summary of Groundwater Analytical Results
Former Raytheon Facility
Wayland, Massachusetts

Parameter / Sample I.D. / Date Sampled / Comments	MCP Reportable Concentrations GW-1	MW-307 20-Sep-02 Low-Flow	MW-313S 19-Sep-02 Low-Flow	MW-313D 19-Sep-02 Low-Flow	MW-314S 19-Sep-02 Low-Flow	MW-314D 19-Sep-02 Low-Flow	MW-315S 19-Sep-02 Low-Flow	MW-315D 19-Sep-02 Low-Flow
Organics								
Volatile Organic Compounds (VOCs) (µg/L)	Compound Specific	-	-	-	-	-	-	-
Polynuclear Aromatic Hydrocarbons (PAHs) (µg/L)	Compound Specific	-	-	-	-	-	-	-
Polychlorinated Biphenyls (PCBs) (µg/L)	0.3	-	-	-	-	-	-	-
Inorganics								
PP13 Dissolved Metals (mg/L)								
Arsenic	0.05	0.029	0.117	0.073	0.028	0.087	0.158	0.071
Zinc	0.9	-	-	-	0.10	-	0.05	-

Notes:
- = Analytical result below the method detection limit.
NS = No Standard
µg/L=micrograms per liter (parts per billion (ppb))
mg/L=milligrams per liter (parts per million (ppm))

Table 2
Summary of Soil Analytical Results
Former Raytheon Facility
Wayland, Massachusetts

Sample I.D. Depth Date Sampled Comment	Reportable Concentrations S-1	B-301 0'-5' 19-Aug-02	B-302 0'-5' 19-Aug-02	B-303 0'-5' 19-Aug-02	B-304 0'-5' 19-Aug-02	B-305 0'-5' 19-Aug-02	B-306 0'-5' 19-Aug-02	B-307 0'-5' 19-Aug-02	B-308 0'-5' 19-Aug-02	B-309 0'-5' 19-Aug-02	B-310 0'-5' 19-Aug-02	B-311 0'-5' 19-Aug-02	B-312 0'-5' 19-Aug-02
Organics													
Volatile Organic Compounds (VOCs) (ug/kg)		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Tetrachloroethene	500												
Trichloroethene	400												
Dichloroethene cis-1,2	2,000												
Dichlorobenzene 1,2-	100,000												
Acetone	3,000												
Benzene	10,000												
Toluene	90,000												
Ethylbenzene	80,000												
Xylene p/m-	500,000												
Xylene o-	500,000												
Isopropylbenzene	1,000,000												
Naphthalene	4,000												
Butylbenzene sec-	NS												
Butylbenzene, n-	NS												
Isopropyltoluene, p-	NS												
Propylbenzene n-	100,000												
Trimethylbenzene, 1,3,5-	10,000												
Trimethylbenzene, 1,2,4-	1,000,000												
Total VOCs													
Polynuclear Aromatic Hydrocarbons (PAHS) (ug/kg)	Compound Specific	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Polychlorinated Biphenyls (PCBs) (ug/kg)	2,000	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Inorganics													
Total PP13 Metals (mg/kg)													
Arsenic	30	6.3	5.7	5.8	5.4	6.0	6.3	6.4	6.4	5.3	5.7	5.1	36
Beryllium	0.7	0.32	-	0.23	-	0.22	0.23	0.23	0.22	-	0.23	0.23	-
Chromium	1,000	9.2	14	9.4	6.1	7.3	12	8.2	9.2	11	10	9.5	10
Copper	1,000	20	30	25	12	13	17	14	15	18	16	13	16
Lead	300	7.2	58	10	4.6	7.2	5.3	7.6	6.8	18	15	9.6	4.6
Mercury	20	-	0.36	-	-	-	-	-	-	-	-	-	-
Nickel	300	8.9	10	6.6	6.5	6.8	9.4	7.2	7.7	6.7	7.0	6.3	12
Silver	100	-	-	-	-	-	-	-	-	-	1.2	-	-
Zinc	2,500	30	84	26	20	59	28	31	33	540	150	36	26

Notes:
- = Not Detected
NS = No Standard
NA = Not Analyzed
Shading indicates exceedence of RCS-1.

Table 2
Summary of Soil Analytical Results
Former Raytheon Facility
Wayland, Massachusetts

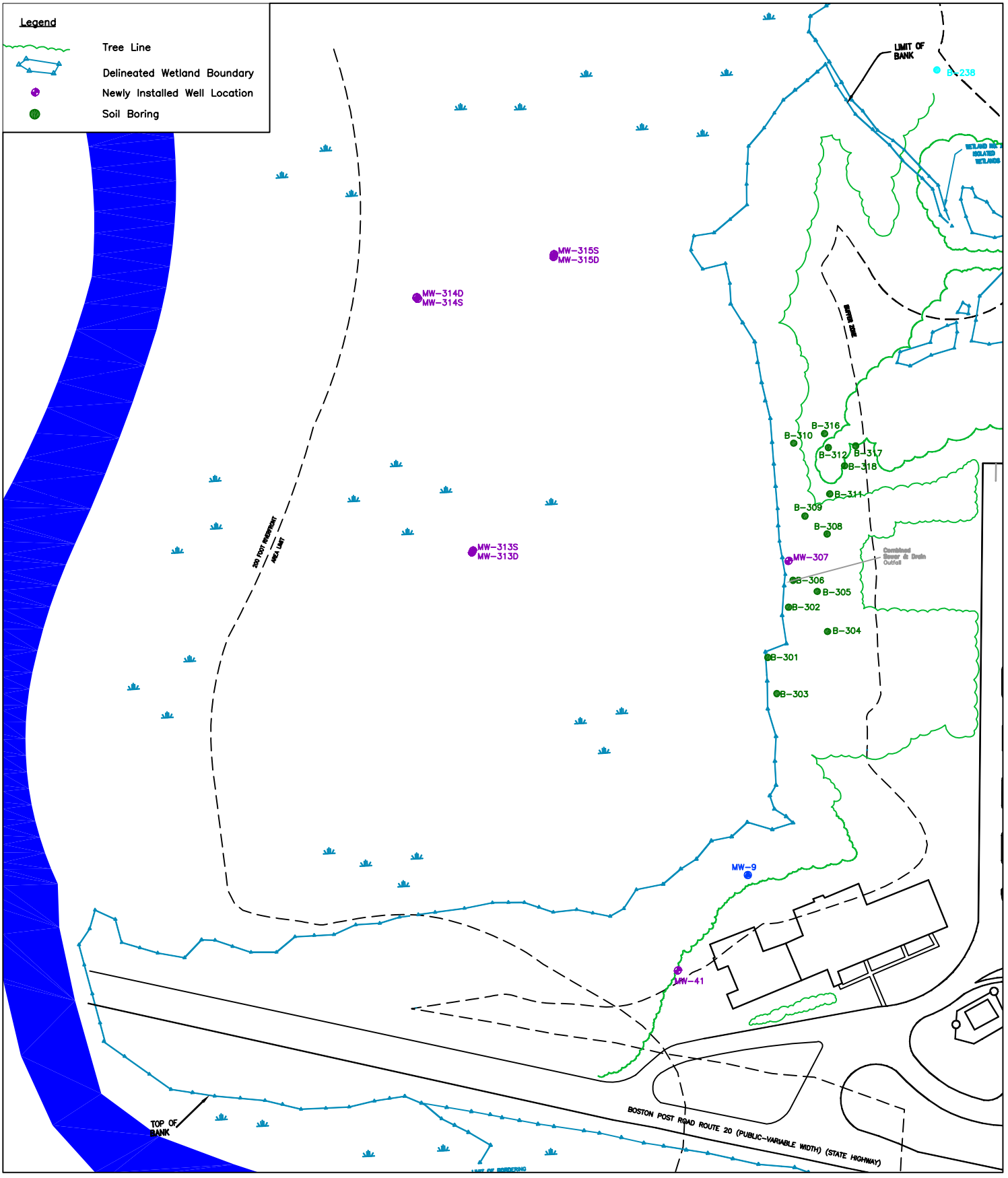
Sample I.D. Depth Date Sampled Comment	Reportable Concentrations S-1	MW-313 5'-7' 26-Aug-02	MW-314 5'-7' 26-Aug-02	MW-315 5'-7' 26-Aug-02	B-316 0'-5' 9-Sep-02	B-317 0'-5' 9-Sep-02	B-318 0'-5' 9-Sep-02
Organics							
Volatile Organic Compounds (VOCs) (ug/kg)			-		NA	NA	NA
Tetrachloroethene	500	-		-			
Trichloroethene	400	-		-			
Dichloroethene cis-1,2	2,000	-		-			
Dichlorobenzene 1,2-	100,000	-		-			
Acetone	3,000	84		140			
Benzene	10,000	-		-			
Toluene	90,000	-		-			
Ethylbenzene	80,000	-		-			
Xylene p/m-	500,000	-		-			
Xylene o-	500,000	-		-			
Isopropylbenzene	1,000,000	-		-			
Naphthalene	4,000	-		-			
Butylbenzene sec-	NS	-		-			
Butylbenzene, n-	NS	-		-			
Isopropyltoluene, p-	NS	-		-			
Propylbenzene n-	100,000	-		-			
Trimethylbenzene, 1,3,5-	10,000	-		-			
Trimethylbenzene, 1,2,4-	1,000,000	-		-			
Total VOCs		84	0	140			
Polynuclear Aromatic Hydrocarbons (PAHS) (ug/kg)	Compound Specific	-	-	-	NA	NA	NA
Polychlorinated Biphenyls (PCBs) (ug/kg)	2,000	-	-	-	NA	NA	NA
Inorganics							
Total PP13 Metals (mg/kg)							
Arsenic	30	-	5.1	-	5.5	6.0	5.1
Beryllium	0.7	-	0.51	-	NA	NA	NA
Chromium	1,000	7.3	8.5	8.8	NA	NA	NA
Copper	1,000	6.2	6.8	14	NA	NA	NA
Lead	300	-	6.6	6.2	NA	NA	NA
Mercury	20	-	-	-	NA	NA	NA
Nickel	300	3.0	3.5	-	NA	NA	NA
Silver	100	-	-	-	NA	NA	NA
Zinc	2,500	-	-	6.7	NA	NA	NA

Notes:
- = Not Detected
NS = No Standard
NA = Not Analyzed
Shading indicates exceedence of RCS-1.

Table 3
Summary of Sediment Analytical Results
Former Raytheon Facility
Wayland, Massachusetts

Parameter / Sample I.D. / Depth / Date Sampled / Comments	Sediment Screening Criteria	SS-21 (6"- 12") 12-Aug-02 Composite	SS-22 (6"- 12") 12-Aug-02	SS-23 (6"- 12") 12-Aug-02 Composite	ERM-DUP (6"- 12") 12-Aug-02 SS-23	SS-24 (6"- 12") 12-Aug-02	SS-25 (6"- 12") 12-Aug-02 Composite	SS-26 (6"- 12") 12-Aug-02
Organics								
Volatile Organic Compounds by EPA Method 8260 (ug/kg)								
Toluene	670*	25	-	-	10	20	-	-
1,2 - Dichlorobenzene	340*	-	13	-	-	-	-	-
Acetone	NS	930	75	110	74	340	510	640
Carbon Disulfide	NS	-	-	-	-	-	-	42
2-Butanone	NS	300	-	24	-	97	100	140
1,2,4 Trichlorobenzene	9,200*	33	-	-	-	-	-	-
Total VOCs		1,288	88	134	84	457	610	822
Alcohol Organics by GC/FID (mg/kg)	NS	-	-	-	-	-	-	-
Gylcol Organics by GC/FID (mg/kg)	NS	-	-	-	-	-	-	-
Aldehydes by SW-846 8315A (ug/kg)	NS							
Formaldehyde		120,000	20,000	36,000	150,000	42,000	120,000	150,000
Propionaldehyde		50,000	-	-	22,000	2,600	-	31,000
Inorganics (mg/kg)								
Boron, Total	NS	-	-	-	-	-	-	-
Cyanide, Physiologically Available	NS	6.3	-	-	-	-	-	4.9
Fluoride	NS	290	-	-	-	-	-	270
Nitrogen, Ammonia	NS	47	22	17	20	32	62	58
TCLP Metals (mg/L)	NS	-	NA	NA	NA	NA	-	NA
TCLP Semi-Volatile Organics (ug/L)	NS	-	NA	NA	NA	NA	-	NA
TCLP Pesticides by GC (ug/L)	NS	-	NA	NA	NA	NA	-	NA
TCLP Herbicides by GC (mg/L)	NS	-	NA	NA	NA	NA	-	NA
TCLP Volatile Organics (ug/L)	NS	-	NA	NA	NA	NA	-	NA

Notes:
- = Analytical result below the method detection limit
NA = Not Analyzed
NS = No Standard
µg/kg =microgram per kilogram (parts per billion (ppb)).
mg/kg =milligram per kilogram (parts per million (ppm)).
* = EPA OSWER Ect-tox threshold



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ERM

Environmental Resources Management
399 Boylston Street
Boston, MA 02116
(617) 267-8377

Revisions			
Symbol	File Path	Date	Approved
	Rachel Wetland Figure		
	G:\Projects\143.xx-Raytheon\Wayland\		
	Job File\Summer 2002 Site Investigations\Raytheon.dwg		

Designed by:
Drawn by: JE
Checked by: RL
Reviewed by: JF
Submitted by:

Former Raytheon Facility
430 Boston Post Road Wayland, MA

Wetland Area Site Plan

Scale: 1"=160'
Date: 10/30/02
Drawing No.
Contract No. 143.66
Figure No. 1

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 D)

Release Tracking Number: 3 - 19485

A. RELEASE OR THREAT OF RELEASE LOCATION:

Release Name: (optional) Former Raytheon Facility

Street: 430 Boston Post Road Location Aid:

City/Town: Wayland ZIP Code: 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 Addresses:

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. Date Submitted:

☐ 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 IRA:

Identify Media and Receptors Affected: (check all that apply) ☐ 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 apply) ☑ Oils ☐ Chlorinated Solvents ☑ Heavy Metals

☑ Others Specify: PCBs

D. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply)

☑ 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.

IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL FORM

Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

D. DESCRIPTION OF RESPONSE ACTIONS (continued):

☐ Removal of Other Contaminated Media

Specify Type and Volume: _____

☐ Temporary Evacuation or Relocation of Residents

☐ Fencing and Sign Posting

☐ Other Response Actions Describe: _____

☐ 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 Technologies: _____

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

Name of Facility: _____

Town and State: _____

Quantity of Remediation Waste Transported to Date: _____

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 Site: _____

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 **BWSC-105**

Bureau of Waste Site Cleanup

Release Tracking Number

IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL FORM Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

3 - 19485

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:

I. PERSON UNDERTAKING IRA:

Name of Organization: Raytheon Company

Name of Contact: 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: (optional)

☐ 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: Former 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 Relationship:

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 Title: Restoration Project Manager
(signature)

For: Raytheon Company Date:
(print name of person or entity recorded in Section I)

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

Street:

City/Town: State: ZIP Code:

Telephone: Ext.: FAX: (optional)

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.